

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF THE DIRECTOR

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In the matter of administrative proceedings )  
against **GERKEN MATERIALS, INC.**, a )  
corporation organized under the laws of the )  
State of Ohio and doing business at hot mix )  
asphalt facilities located in the Counties of )  
Lenawee, Monroe, and Hillsdale, State of )  
Michigan )

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AQD No. 34-2014

SRN: B7068, N1536  
N7740

STIPULATION FOR ENTRY OF FINAL ORDER  
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) against Gerken Materials, Inc. (Company), an Ohio corporation with its principal office located at 9-072 County Road 424 in the City of Napoleon, County of Henry, state of Ohio and doing business at hot mix asphalt facilities located at 2675 Treat Street in the City of Adrian, County of Lenawee, state of Michigan with State Registration Number (SRN) B7068 (Adrian facility); 5100 West Stearns Road in the City of Ottawa Lake, County of Monroe, state of Michigan with SRN N1536 (Ottawa Lake facility); and 1660 East Chicago Road in the City of Jonesville, County of Hillsdale, state of Michigan with SRN N7740 (Jonesville facility). The MDEQ alleges that the Company is in violation of Permit to Install (PTI) No. 783-79F (Adrian facility); PTI No. 116-87C (Ottawa Lake facility), and PTI No. 369-06 (Jonesville facility). Specifically, the MDEQ alleges that the Company failed to conduct toxic air contaminant testing to verify and quantify emission rates of acrolein, arsenic, benzene, ethylbenzene, formaldehyde, lead, manganese, naphthalene, nickel, sulfuric mist, toluene and xylene, as cited herein and in the Violation Notice dated November 10, 2009. The Company and MDEQ stipulate to the termination of this proceeding by entry of this Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.

2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.

3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.

4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.

5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.

8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

#### COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Permit

1. On and after the effective date of this Consent Order, the Company shall fully comply with PTI No. 783-79G (Adrian facility); PTI No. 116-87D (Ottawa Lake facility), and PTI No. 369-06A (Jonesville facility), and any subsequent permit revisions. The permits are attached to this Consent Order as Exhibit A, Exhibit B and Exhibit C and made an enforceable part of the Consent Order.

#### GENERAL PROVISIONS

10. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

11. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the alleged violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

12. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of \$39,441.00 which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall include the "Payment Identification No. AQD40041" on the face of the check and/or in the cover letter with the payment. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

13. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.A.1 of this Consent Order, the Company is subject to a stipulated fine of up to \$1,000.00 per violation. On and after the effective date of Exhibit A and this Consent Order, if the Company fails to comply with any other provision of this Consent Order, the Company is subject to a stipulated fine of up to \$500.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the "Payment Identification No. AQD40041-S" on the front of the check and/or in the cover letter with the payment. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

14. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

15. To ensure timely payment of the settlement amount assessed in paragraph 12 and any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest penalty shall be determined at a rate of twelve percent (12%) per year compounded annually, using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

16. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 12. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

17. This compliance program is not a variance subject to the 12-month limitation specified in Section 5538 of Part 55.

18. This Consent Order shall remain in full force and effect for a period of at least five (5) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Jackson District Office District Supervisor; (iii) confirmation that all records required to be maintained

pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

19. In the event the Company sells or transfers the facilities, with SRNs B7068, N1536 and N7740, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Jackson District Office Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, the Company must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Jackson District Office District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

20. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

21. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

22. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facilities located at 2675 Treat Street, Adrian, Michigan; 5100 West Stearns Road, Ottawa Lake, Michigan, and 1660 East Chicago Road, Jonesville, Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

GERKEN MATERIALS, INC.

BRENT GERKEN, PRESIDENT  
Print Name and Title

Brent Gerken Date: 5-7-14  
Signature

The above signatory subscribed and sworn to before me this 7 day of May, 2014.



ANDREAL OHLRICH  
Notary Public, State of Ohio  
My Commission Expires Feb. 17, 2017

Andrea L. Ohlrich  
Notary Public

Approved as to Content:

G. Vinson Hellwig  
G. Vinson Hellwig, Chief  
AIR QUALITY DIVISION  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

Dated: 5/29/2014

Approved as to Form:

Neil Gordon  
Neil Gordon, Section Head  
ENVIRONMENTAL REGULATION SECTION  
ENVIRONMENT, NATURAL RESOURCES,  
AND AGRICULTURE DIVISION  
DEPARTMENT OF ATTORNEY GENERAL


Dated: 5/19/2014

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

  
G. Vinson Hellwig, Chief  
Air Quality Division

Effective Date: 5/29/2014

AQD No. 34-2014

Exhibit A

Adrian Facility, SRN: B7068

PTI No. 783-79G



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

February 6, 2014

**PERMIT TO INSTALL**  
783-79G

**ISSUED TO**  
Gerken Materials, Inc.

**LOCATED AT**  
2675 Treat Road  
Adrian, Michigan

**IN THE COUNTY OF**  
Lenawee

**STATE REGISTRATION NUMBER**  
B7068

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 Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. 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: <b>January 13, 2014</b>	
DATE PERMIT TO INSTALL APPROVED: <b>February 6, 2014</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

## PERMIT TO INSTALL

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
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
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	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	ng	Nanogram
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	Oxides of nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch, absolute
PTI	Permit to Install	psig	Pounds per square inch, gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur dioxide
SCR	Selective Catalytic Reduction	THC	Total hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile organic compound
VE	Visible Emissions	yr	Year

\* 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 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, 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 and 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 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). **(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 SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EUHMAPLANT	Hot mix asphalt (HMA) facility including: Aggregate conveyors, 225 ton per hour counter flow drum dryer/mixer, Fabric filter dust collector	FGFACILITY
EUYARD	Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins)	FGFACILITY
EUACTANKS	Liquid asphalt cement storage tanks with a vapor condensation and recovery system for control.	FGFACILITY
EUSILOS	Hot Mix Asphalt (HMA) paving material product storage silo with an emission capture system (top of silo) and load-out control to control silo process emissions.	FGFACILITY

**The following conditions apply to: EUHMAPLANT**

**DESCRIPTION:** 225 ton per hour counter flow drum dryer/mixer

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.04 gr/dscf	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	40 CFR 60, Subparts A & I
2. CO	0.4 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13, SC VI.8, SC VI.9	R 336.1205(3)
3. Lead	2.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(3)
4. Benzene	0.001 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
5. Toluene	0.006 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
6. Ethylbenzene	0.001 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
7. Xylene	0.001 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
8. Naphthalene	0.001 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
9. Formaldehyde	0.007 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
10. Acrolein	0.001 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
11. Arsenic	1.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
12. Nickel	1.0×10 <sup>-4</sup> lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
13. H <sub>2</sub> SO <sub>4</sub>	0.0032 lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
14. Manganese	5.0×10 <sup>-5</sup> lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225

<sup>a</sup> Pound pollutant per ton of HMA paving material produced.

<sup>\*</sup> Test Protocol shall specify averaging time.

## **II. MATERIAL LIMITS**

1. The permittee shall not burn any fuel other than natural gas in EUHMAPLANT. **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall not use any asbestos tailings or waste materials containing asbestos in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. **(R 336.1225, 40 CFR Part 61 Subparts A & M)**
3. The permittee shall limit the asphalt mixture processed in EUHMAPLANT to a maximum of 50 percent RAP material or 50 percent recycled shingles material or any combination of the two materials that is equivalent to 50 percent of the asphalt mixture, based on a monthly average. **(R 336.1224, R 336.1225, R 336.1702)**
4. The permittee shall not process more than 100,000 tons of HMA 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))**
5. The permittee shall not process more than 225 tons of HMA paving materials in EUHMAPLANT per hour based on a daily average, which shall be determined by dividing the daily HMA production by the daily operating hours. **(R 336.1224, R 336.1225, R 336.1702)**

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUHMAPLANT unless the Fugitive Dust Control Plan for EUYARD specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**
2. The permittee shall not operate EUHMAPLANT unless the Preventative Maintenance Program specified in Appendix B has been implemented and is maintained. **(R 336.1910, R 336.1911)**
3. The permittee shall not operate EUHMAPLANT unless the Emission Abatement Plan for Startup, Shutdown and Malfunctions specified in Appendix C has been implemented and is maintained. **(R 336.1911, R 336.1912)**
4. The permittee shall maintain the efficiency of the EUHMAPLANT drum mix burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. This shall be done at the start of each paving season or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. **(R 336.1205)**

## **IV. DESIGN/EQUIPMENT PARAMETERS**

1. 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 10 inches of water column. The minimum pressure drop shall not be less than 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD. **(R 336.1910)**
2. 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 336.1224, R 336.1225, R 336.1702)**



#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Verification and quantification of odor emissions from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, may be required for continued operation. Within 60 days upon notification from AQD District Supervisor, a complete stack sampling and odor threshold analysis plan using the Dynamic Dilution Method shall be submitted to the AQD. The stack sampling plan shall include provisions for various fuel usages, plant operating conditions, and odor neutralizer system operation (if any). 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 from notification from the AQD District Supervisor. **(R 336.1901, R 336.2001, R 336.2003, R 336.2004)**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1201, R 336.1205(1)(a))**
2. The permittee shall monitor, in a satisfactory manner, the virgin aggregate feed rate and the RAP feed rate to the EUHMAPLANT on a continuous basis. **(R 336.1224, R 336.1225, R 336.1702)**
3. 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. The CO emissions should be less than 500 ppmv to ensure EUHMAPLANT is operating properly. 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(3), R 336.1224, R 336.1225, R 336.1702)**
4. 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. The permittee shall keep records of all source emissions data and operating information on file and make them available upon request. **(40 CFR Part 60 Subparts A & I)**
5. The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all drum mixer/burner and fabric filter dust collector 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 specified in Appendix B. All records shall be kept on file and made available to the Department upon request. **(R 336.1910, R 336.1911)**
6. The permittee shall keep the following records for each calendar month that EUHMAPLANT is operated:
  - a) Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP.

All records shall be kept on file 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)**

7. The permittee shall keep intermittent daily records of the following production information for EUHMAPLANT:
- a) The virgin aggregate feed rate.
  - b) The RAP feed rate.
  - c) The asphalt paving material product temperature.
  - d) Information sufficient to identify all components of the asphalt paving material mixture.
- 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)**
8. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs 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 and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**
9. The permittee shall keep records, as described in SC VI.3, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to ensure proper operation of the drum dryer or associated burner. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**
10. The permittee shall keep, in a satisfactory manner, average daily, 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 and made available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3))**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVHMAPLANT	48	48	R 336.1225

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUYARD**

**DESCRIPTION:** Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins)

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** N/A

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUYARD unless the fugitive dust control plan specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1371, R 336.1372)**
2. The permittee shall calculate in a satisfactory manner, the annual fugitive dust emissions. 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)**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUACTANKS**

**DESCRIPTION:** Liquid asphalt cement storage tanks

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Vapor condensation and recovery system

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. **(R 336.1224)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUSILOS**

**DESCRIPTION:** Hot Mix Asphalt (HMA) paving material product storage silo

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner. **(R 336.1224)**
2. The permittee shall not operate EUSILOS unless all the silo load-out activities occur in an area that is controlled by the Blue Smoke collection system. Emissions collected from the truck load-out area shall be vented to the filter media, vented into the burning zone of EUHMAPLANT or controlled by equivalent means. The permittee shall not operate EUSILOS unless the silo load-out control system is installed, maintained and operated in a satisfactory manner. **(R 336.1901)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).



**FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUHMAPLANT EUYARD EUACTANKS EUSILOS

**The following conditions apply Source-Wide to: FGFACILITY**

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control, Vapor condensation and recovery system, Fabric filter dust collector

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3))

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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 monitoring/recordkeeping special condition. **(R 336.1201)**
2. The permittee shall keep the following information on a rolling 12-month rolling time period basis for FGFACILITY:
  - a) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - b) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

If stack test results for FGFACILITY 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 FGFACILITY. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3))**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

## **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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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.
- 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.

### **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 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD.
- 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 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 the MDEQ.

---

**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.

## **Appendix B - Continued**

### **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. Any such visible emission shall be recorded in the Daily Operations Log Book and made available upon request to the AQD.
- All significant maintenance activities performed on the fabric filter dust collector.

**Appendix C**  
**EMISSION ABATEMENT PLAN FOR STARTUP, SHUTDOWN AND MALFUNCTIONS**

**NORMAL STARTUP PROCEDURE**

The plant computer controls plant startup. At startup the plant operator will enter the mix design, the tons per hour and the number of tons to be produced into the plant operations computer. Once the operator starts the equipment the computer will start the cold feed bins and set the feed rate (tons per hour) requested. The feed rate will be different for each mix design and production rate.

When the plant computer senses that aggregate is crossing over the belt scale, a timer that has been previously calibrated for the particular mix, starts to count down. When the timer reaches zero the asphalt is started and fed to the mixer. The two products (aggregate and asphalt cement) meeting together at the correct time will eliminate most dust that would escape from the mixing drum.

Material that is discharged at startup is removed by way of the drag slat and discharge gate. This material is dropped into a loader bucket, dump truck or a holding area. The material is then moved to the recycle pile.

The drop height from the discharge gate is kept to the very minimum to keep any escaping dust from blowing.

**NORMAL SHUTDOWN PROCEDURE**

When shutting down the mixing operation, the plant computer stops the cold feed bins first. Material that is in process is allowed to proceed down the weigh belt. When the weigh belt senses that all material has cleared the belt a timer starts counting down to shut off the asphalt cement. This timer allows all of the aggregate to clear the drying drum and enter the mixer. The asphalt cement is timed for each mix design so that the last of the aggregate and the asphalt cement meet at the mixing drum together.

Any mix that is waste is discharged into the loader bucket, dump truck or into a holding area under the drag slat discharge gate and is taken to the RAP pile for later crushing

**HOT STOPS - HOT STARTS**

If the silos become too full, the plant operator may have to make a hot stop, (dryer and mixer full of material). No material is discharged during a hot stop. The plant can remain in this mode for up to two hours.

After a hot stop, the plant will make a hot start. The exhaust fan and burner will be started and once running, the rest of the plant will be started. Cold or off-spec material is discharged through the drag slat discharge gate and placed in the RAP pile for later use.

**MALFUNCTION STOPS**

If a malfunction (computer or mechanical) occurs during drying/mixing operations, a hot stop will be initiated until the problem is corrected. If the problem cannot be corrected and the dryer/mixer must be emptied, the asphalt cement can be controlled manually. This will be done only after all attempts to correct the problem are exhausted.

If the asphalt pump fails and cannot be repaired, the drum will be emptied of mixed material until the discharged aggregate gets dusty. The drum will then be stopped and the asphalt pump repaired.

A water supply at each location can be used to knock down any blowing dust.

**IDENTIFICATION OF SUPERVISORY AND MAINTENANCE PERSONNEL**

An updated list of current supervisory and maintenance personnel shall be kept at the plant. Descriptions of the responsibilities of these individuals for operation of the plant during startups, shutdowns, or malfunctions, as well as inspections and repairs, shall be stated on the updated list.

### Appendix C – Continued

#### DESCRIPTION OF INSPECTED ITEMS

A daily walk around inspection will be done each morning while the plant is warming up. After startup, observations will be carried out continuously throughout the day by the plant operator and the loader operator during operations. The following items shall be inspected/observed:

- Roadways (fugitive dust)
- Cold feed bins (falling aggregate)
- Aggregate feed belts (falling aggregate)
- Dryer (seals for dust escaping)
- Bucket elevator (seals for dust escaping)
- Aggregate chutes (seals for dust escaping)
- Screen (door seals for dust escaping)
- Weigh hopper (seals for dust escaping)
- Mixer (seals for dust escaping)
- Baghouse stack (opacity)
- Baghouse screws (shaft and door seals for dust escaping)
- Chutes, screw augers, and housings (for any leaks)

A more thorough inspection will be done during the winter shutdown (between December 1 and April 1) for maintenance and repairs. The following items will be inspected and repairs made as needed:

- Cold feed bins (seals and belts rollers)
- Belt lines (belts and rollers)
- Dryer (shell, seals, flights)
- Bucket elevator (chain, buckets, bearings, seals)
- Chutes (liners, seals)
- Screen (door seals, fugitive ductwork)
- Weigh hopper (seals, calibration)
- Mixer (seals, wear plate)

The baghouse will get a thorough inspection from the front inlet to the rear exhaust fan. This inspection will be done every spring before the paving season starts. (Additional visual inspections may be required before and during the paving season as required by Appendix B). The following items to be inspected are:

- Ductwork (inspected for thickness, will it last for the season)
- Blow pipes, diaphragm valves (are they working, good connections)
- Bags and cages (condition of bags, age, number replaced during last season)
- Dust screws - shaft seals and screw cover doors

#### REPLACEMENT PARTS

As required by Appendix B, the following shall be kept in stock at all times:

- A minimum of 15 bags.
- A minimum of 5 pounds of black light powder. (Recommended quantity for the number of square feet of baghouse cloth.)
- A minimum of two (2) tubes of silicone caulk for minor leaks around doors and seals.

## Appendix C – Continued

### **BAGHOUSE VARIABLES AND MONITORING**

The baghouse is monitored continuously (as specified in Appendix B) by the use of a magnehelic gage. The pressure differential between the dirty and clean side of the baghouse shall be maintained above 2 inches water gauge. If the pressure rises above 10 inches water gauge, signaling an inoperative diaphragm valve, the plant shall be stopped and the defective valve repaired or replaced. If the differential pressure drops below 2 inches water gauge the company shall inspect for a torn bag or a problem with the tubesheet between the dirty and clean side of the baghouse. This problem will also result in a dirty stack. The only time the baghouse will normally drop below 2 inches water gauge is if a large number of filter bags are replaced.

If a large number of bags are replaced (over 100) the pressure on the magnehelic will drop slightly. This drop will only last for a day or less depending on the production.

Monitoring of the baghouse is done by observation, magnehelic or by the high temperature alarm that is set to go off at a stack temperature of 375/400 degrees Fahrenheit.

### **CORRECTIVE PROCEDURES AND RESPONSIBLE PERSONS**

This startup, shutdown, malfunction plan shall be followed to meet the compliance limits. If the limits are exceeded it is the responsibility of the plant supervisor, or in his absence the plant operator, to stop the plant and correct the problem immediately. Rule 336.1912 shall be followed when abnormal conditions exist.

### **DRUM MIX AND BATCH - NORMAL STARTUP PROCEDURES**

During startup, operation and shutdown the following items will be monitored continuously:

**Stack Temperature** - As material starts through the plant the temperature must be brought up slowly by manually adjusting the burner. As the operator opens the burner, the exhaust fan damper must also be opened to maintain one quarter to one half inch of suction on the burner end of the drum.

**Mix Temperature** - As material starts flowing through the plant it is critical to watch mix discharge temperature in addition to the stack temperature. A discharge temperature that is too high will cause blue smoke. A temperature that is too low will produce an unacceptable product.

**Exhaust Magnehelic** - As material is fed into the drum and the burner is opened up, the differential pressure in the baghouse will increase. As the plant reaches normal operating parameters the pressure differential will settle between 2 and 10 inches water gauge. The differential pressure can be adjusted by opening or closing the exhaust damper. The operator shall keep between one quarter and one half-inch draw on the burner end for maximum efficiency.

Along with monitoring the above items the operator shall monitor the weather to determine any changes to the moisture levels in the aggregate and RAP. The moisture content determines how to adjust the burner to reach the desired mix discharge temperature.



AQD No. 34-2014

Exhibit B

Ottawa Lake facility, SRN: N1536

PTI No. 116-87D

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

February 6, 2014

**PERMIT TO INSTALL**  
116-87D

**ISSUED TO**  
Gerken Materials, Inc.

**LOCATED AT**  
5100 Stearns Road  
Ottawa Lake, Michigan

**IN THE COUNTY OF**  
Monroe

**STATE REGISTRATION NUMBER**  
N1536

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 Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. 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:

**January 13, 2014**

DATE PERMIT TO INSTALL APPROVED:

**February 6, 2014**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

## PERMIT TO INSTALL

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
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
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	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	ng	Nanogram
MAP	Malfuction Abatement Plan	NO <sub>x</sub>	Oxides of nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch, absolute
PTI	Permit to Install	psig	Pounds per square inch, gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur dioxide
SCR	Selective Catalytic Reduction	THC	Total hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile organic compound
VE	Visible Emissions	yr	Year

\* 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 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, 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 and 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 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). **(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 SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EUHMAPLANT	Hot mix asphalt (HMA) facility including: Aggregate conveyors Batch mix plant 200 TPH capacity Fabric filter dust collector	FGFACILITY
EUYARD	Fugitive dust sources including: Plant roadways Plant yard Material storage piles Material handling operations (excluding cold feed aggregate bins)	FGFACILITY
EUACTANKS	Liquid asphalt cement storage tanks with a vapor condensation and recovery system.	FGFACILITY
EUSILOS	Hot Mix Asphalt (HMA) paving material product storage silos with an emission capture system for the top of each storage silo and loadout emission control.	FGFACILITY

**The following conditions apply to: EUHMAPLANT**

**DESCRIPTION:** Hot mix asphalt facility including aggregate conveyors and 200 TPH capacity batch mix plant

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.04 gr/dscf	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	40 CFR 60, Subparts A & I
2. CO	0.4 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13, SC VI.8, SC VI.9	R 336.1205(3)
3. Lead	2.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(3)
4. Benzene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
5. Toluene	0.006 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
6. Ethylbenzene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
7. Xylene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
8. Naphthalene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
9. Formaldehyde	0.01 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
10. Acrolein	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
11. Arsenic	1.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
12. Nickel	1.0×10 <sup>-4</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
13. H <sub>2</sub> SO <sub>4</sub>	0.0032 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
14. Manganese	5.0×10 <sup>-5</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225

<sup>a</sup> Pound pollutant per ton of HMA paving material produced.

\* Test Protocol shall specify averaging time.



## **II. MATERIAL LIMITS**

1. The permittee shall not burn any fuel other than No. 2 fuel oil, No. 4 fuel oil, blended fuel oil, RUO or natural gas in EUHMAPLANT. **(R 336.1224, R 336.1225, R 336.1702)**
2. 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, or ash content vary from the standards specified in the following table. **(R 336.1201(3), 336.1225)**

<b>Contaminant</b>	<b>Limit</b>	<b>Units</b>
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	1.5	Weight %
Minimum Flash Point	100.0	°F
Maximum Ash Content	1.0	Weight %

3. The permittee shall not use any asbestos tailings or waste materials containing asbestos in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. **(R 336.1225, 40 CFR Part 61 Subparts A & M)**
4. The permittee shall limit the asphalt mixture processed in EUHMAPLANT to a maximum of 30 percent RAP material or 30 percent recycled shingles material or any combination of the two materials that is equivalent to 30 percent of the asphalt mixture, based on a monthly average. **(R 336.1224, R 336.1225, R 336.1702)**
5. The permittee shall not process more than 100,000 tons of HMA 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))**
6. The permittee shall not process more than 200 tons of HMA paving materials in EUHMAPLANT per hour based on a daily average, which shall be determined by dividing the daily HMA production by the daily operating hours. **(R 336.1224, R 336.1225, R 336.1702)**

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUHMAPLANT unless the Fugitive Dust Control Plan for EUYARD specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**
2. The permittee shall not operate EUHMAPLANT unless the Preventative Maintenance Program specified in Appendix B has been implemented and is maintained. **(R 336.1910, R 336.1911)**
3. The permittee shall not operate EUHMAPLANT unless the Emission Abatement Plan for Startup, Shutdown and Malfunctions specified in Appendix C has been implemented and is maintained. **(R 336.1911, R 336.1912)**
4. The permittee shall not operate EUHMAPLANT unless the Compliance Monitoring Plan (CMP) for RUO specified in Appendix D, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. **[R 336.1201(3), R 336.1225, R 336.1371, R 336.1372, R 336.1910, R 336.1911, Act 451 324.5521, 40 CFR 60.50c(c)]**

5. The permittee shall maintain the efficiency of the EUHMAPLANT batch plant burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. This shall be done at the start of each paving season or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. **(R 336.1205)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EUHMAPLANT unless the knockout box and fabric filter dust collector are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 2 and 10 inches of water column. The minimum pressure drop shall not be less than 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD. **(R 336.1910)**
2. The permittee shall not operate EUHMAPLANT unless the emission capture system for the pugmill, ducted back to the burner for the destruction of captured emissions, is installed, maintained, and operated in a satisfactory manner. **(R 336.1910)**
3. 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 336.1224, R 336.1225, R 336.1702)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Verification and quantification of odor emissions from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, may be required for continued operation. Within 60 days upon notification from AQD District Supervisor, a complete stack sampling and odor threshold analysis plan using the Dynamic Dilution Method shall be submitted to the AQD. The stack sampling plan shall include provisions for various fuel usages, plant operating conditions, and odor neutralizer system operation (if any). 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 from notification from the AQD District Supervisor. **(R 336.1901, R 336.2001, R 336.2003, R 336.2004)**
2. Verification and quantification of emission rates of CO from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, will be required for continued operation. Within 60 days of permit issuance 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 one calendar year of the startup notification required in SC IX.1. **(R 336.1205(3), R 336.2001, R 336.2003, R 336.2004)**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1201, R 336.1205(1)(a))**
2. The permittee shall monitor, in a satisfactory manner, the virgin aggregate feed rate and the RAP feed rate to the EUHMAPLANT on a continuous basis. **(R 336.1224, R 336.1225, R 336.1702)**

3. 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. The CO emissions should be less than 500 ppmv to ensure EUHMAPLANT is operating properly. 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(3), R 336.1224, R 336.1225, R 336.1702)**

4. 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. The permittee shall keep records of all source emissions data and operating information on file and make them available upon request. **(40 CFR Part 60 Subparts A & I)**

5. The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all batch plant/burner and fabric filter dust collector 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 specified in Appendix B. All records shall be kept on file and made available to the Department upon request. **(R 336.1910, R 336.1911)**

6. The permittee shall keep the following records for each calendar month 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, which shall be provided by the supplier.
- c) Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP.

All records shall be kept on file 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)**

7. The permittee shall keep intermittent daily records of the following production information for EUHMAPLANT:

- a) The virgin aggregate feed rate.
- b) The RAP feed rate.
- c) The asphalt paving material product temperature.
- d) Information sufficient to identify all components of the asphalt paving material mixture.

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)**

8. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs 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 and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**

9. The permittee shall keep records, as described in SC VI.3, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to ensure proper operation of the batch plant or associated burner. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**
10. The permittee shall keep, in a satisfactory manner, average daily, 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 and made available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3))**

## **VII. REPORTING**

N/A

## **VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVHMAPLANT	30 by 55	44	R 336.1225

## **IX. OTHER REQUIREMENTS**

1. At least seven calendar days prior to start-up, the permittee shall notify the AQD District Supervisor in writing of the start-up date of EUHMAPLANT covered by this permit. **(R 336.1201)**

### **Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUYARD**

**DESCRIPTION:** Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins)

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** N/A

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUYARD unless the fugitive dust control plan specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1371, R 336.1372)**
2. The permittee shall calculate in a satisfactory manner, the annual fugitive dust emissions. 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)**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUACTANKS**

**DESCRIPTION:** Liquid asphalt cement storage tanks

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Vapor condensation and recovery system

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. **(R 336.1224)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).



**The following conditions apply to: EUSILOS**

**DESCRIPTION:** Hot Mix Asphalt (HMA) paving material product storage silo

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes but is not limited to operating the emission capture system per manufacturer specifications which shall be maintained on site and made available to the Department upon request. **(R 336.1224, R 336.1910)**
2. The permittee shall not operate FGFACILITY unless all the silo and batch tower loadout activities occur in a partially enclosed area from which the emissions are captured and ducted through the loadout system baghouse control device, and the loadout control system is installed, maintained, and operated in a satisfactory manner. **(R 336.1910, R 336.1901)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUHMAPLANT EUYARD EUACTANKS EUSILOS

**The following conditions apply Source-Wide to: FGFACILITY**

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control, Vapor condensation and recovery system, Fabric filter dust collector

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3))

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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 monitoring/recordkeeping special condition. **(R 336.1201)**
2. The permittee shall keep the following information on a rolling 12-month rolling time period basis for FGFACILITY:
  - a) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - b) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

If stack test results for FGFACILITY 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 FGFACILITY. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3))**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

## **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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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.
- 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.

### **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 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD.
- 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 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.

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**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.

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**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.

## **Appendix B - Continued**

### **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. Any such visible emission shall be recorded in the Daily Operations Log Book and made available upon request to the AQD.
- All significant maintenance activities performed on the fabric filter dust collector.

**Appendix C**  
**EMISSION ABATEMENT PLAN FOR STARTUP, SHUTDOWN AND MALFUNCTIONS**

**NORMAL STARTUP PROCEDURE**

The plant computer controls plant startup. At startup the plant operator will enter the mix design, the tons per hour and the number of tons to be produced into the plant operations computer. Once the operator starts the equipment the computer will start the cold feed bins and set the feed rate (tons per hour) requested. The feed rate will be different for each mix design and production rate.

When the plant computer senses that aggregate is crossing over the belt scale, a timer that has been previously calibrated for the particular mix, starts to count down. When the timer reaches zero the asphalt is started and fed to the pugmill. The two products (aggregate and asphalt cement) meeting together at the correct time will eliminate most dust that would escape from the mixing process.

Material that is discharged at startup is removed by way of the drag slat and discharge gate. This material is dropped into a loader bucket, dump truck or a holding area. The material is then moved to the recycle pile.

The drop height from the discharge gate is kept to the very minimum to keep any escaping dust from blowing.

**NORMAL SHUTDOWN PROCEDURE**

When shutting down the mixing operation, the plant computer stops the cold feed bins first. Material that is in process is allowed to proceed down the weigh belt. When the weigh belt senses that all material has cleared the belt a timer starts counting down to shut off the asphalt cement. This timer allows all of the aggregate to clear the batch plant and enter the pugmill. The asphalt cement is timed for each mix design so that the last of the aggregate and the asphalt cement meet at the pugmill together.

Any mix that is waste is discharged into the loader bucket, dump truck or into a holding area under the drag slat discharge gate and is taken to the RAP pile for later crushing

**HOT STOPS - HOT STARTS**

If the silos become too full, the plant operator may have to make a hot stop, (batch plant and pugmill full of material). No material is discharged during a hot stop. The plant can remain in this mode for up to two hours.

After a hot stop, the plant will make a hot start. The exhaust fan and burner will be started and once running, the rest of the plant will be started. Cold or off-spec material is discharged through the drag slat discharge gate and placed in the RAP pile for later use.

**MALFUNCTION STOPS**

If a malfunction (computer or mechanical) occurs during drying/mixing operations, a hot stop will be initiated until the problem is corrected. If the problem cannot be corrected and the batch plant/pugmill must be emptied, the asphalt cement can be controlled manually. This will be done only after all attempts to correct the problem are exhausted.

If the asphalt pump fails and cannot be repaired, the batch plant will be emptied of mixed material until the discharged aggregate gets dusty. The batch plant will then be stopped and the asphalt pump repaired.

A water supply at each location can be used to knock down any blowing dust.

**IDENTIFICATION OF SUPERVISORY AND MAINTENANCE PERSONNEL**

An updated list of current supervisory and maintenance personnel shall be kept at the plant. Descriptions of the responsibilities of these individuals for operation of the plant during startups, shutdowns, or malfunctions, as well as inspections and repairs, shall be stated on the updated list.



### Appendix C – Continued

#### DESCRIPTION OF INSPECTED ITEMS

A daily walk around inspection will be done each morning while the plant is warming up. After startup, observations will be carried out continuously throughout the day by the plant operator and the loader operator during operations. The following items shall be inspected/observed:

- Roadways (fugitive dust)
- Cold feed bins (falling aggregate)
- Aggregate feed belts (falling aggregate)
- Dryer (seals for dust escaping)
- Bucket elevator (seals for dust escaping)
- Aggregate chutes (seals for dust escaping)
- Screen (door seals for dust escaping)
- Weigh hopper (seals for dust escaping)
- Mixer (seals for dust escaping)
- Baghouse stack (opacity)
- Baghouse screws (shaft and door seals for dust escaping)
- Chutes, screw augers, and housings (for any leaks)

A more thorough inspection will be done during the winter shutdown (between December 1 and April 1) for maintenance and repairs. The following items will be inspected and repairs made as needed:

- Cold feed bins (seals and belts rollers)
- Belt lines (belts and rollers)
- Dryer (shell, seals, flights)
- Bucket elevator (chain, buckets, bearings, seals)
- Chutes (liners, seals)
- Screen (door seals, fugitive ductwork)
- Weigh hopper (seals, calibration)
- Mixer (seals, wear plate)

The baghouse will get a thorough inspection from the front inlet to the rear exhaust fan. This inspection will be done every spring before the paving season starts. (Additional visual inspections may be required before and during the paving season as required by Appendix B). The following items to be inspected are:

- Ductwork (inspected for thickness, will it last for the season)
- Blow pipes, diaphragm valves (are they working, good connections)
- Bags and cages (condition of bags, age, number replaced during last season)
- Dust screws - shaft seals and screw cover doors

#### REPLACEMENT PARTS

As required by Appendix B, the following shall be kept in stock at all times:

- A minimum of 15 bags.
- A minimum of 5 pounds of black light powder. (Recommended quantity for the number of square feet of baghouse cloth.)
- A minimum of two (2) tubes of silicone caulk for minor leaks around doors and seals.

## Appendix C – Continued

### **BAGHOUSE VARIABLES AND MONITORING**

The baghouse is monitored continuously (as specified in Appendix B) by the use of a magnehelic gage. The pressure differential between the dirty and clean side of the baghouse shall be maintained above 2 inches water gauge. If the pressure rises above 10 inches water gauge, signaling an inoperative diaphragm valve, the plant shall be stopped and the defective valve repaired or replaced. If the differential pressure drops below 2 inches water gauge the company shall inspect for a torn bag or a problem with the tubesheet between the dirty and clean side of the baghouse. This problem will also result in a dirty stack. The only time the baghouse will normally drop below 2 inches water gauge is if a large number of filter bags are replaced.

If a large number of bags are replaced (over 100) the pressure on the magnehelic will drop slightly. This drop will only last for a day or less depending on the production.

Monitoring of the baghouse is done by observation, magnehelic or by the high temperature alarm that is set to go off at a stack temperature of 375/400 degrees Fahrenheit.

### **CORRECTIVE PROCEDURES AND RESPONSIBLE PERSONS**

This startup, shutdown, malfunction plan shall be followed to meet the compliance limits. If the limits are exceeded it is the responsibility of the plant supervisor, or in his absence the plant operator, to stop the plant and correct the problem immediately. Rule 336.1912 shall be followed when abnormal conditions exist.

### **DRUM MIX AND BATCH - NORMAL STARTUP PROCEDURES**

During startup, operation and shutdown the following items will be monitored continuously:

**Stack Temperature** - As material starts through the plant the temperature must be brought up slowly by manually adjusting the burner. As the operator opens the burner, the exhaust fan damper must also be opened to maintain one quarter to one half inch of suction on the burner end of the batch plant.

**Mix Temperature** - As material starts flowing through the plant it is critical to watch mix discharge temperature in addition to the stack temperature. A discharge temperature that is too high will cause blue smoke. A temperature that is too low will produce an unacceptable product.

**Exhaust Magnehelic** - As material is fed into the batch plant and the burner is opened up, the differential pressure in the baghouse will increase. As the plant reaches normal operating parameters the pressure differential will settle between 2 and 10 inches water gauge. The differential pressure can be adjusted by opening or closing the exhaust damper. The operator shall keep between one quarter and one half-inch draw on the burner end for maximum efficiency.

Along with monitoring the above items the operator shall monitor the weather to determine any changes to the moisture levels in the aggregate and RAP. The moisture content determines how to adjust the burner to reach the desired mix discharge temperature.

Appendix D

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

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

Each shipment from the used oil supplier must be accompanied by documentation demonstrating that the used oil meets specification levels in 40 CFR 279.11 (Standards for the Management of Used Oil) and R 299.9809, promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The documentation shall include supplier certification and analytical data. The analysis must be for the batch of used oil accepted for use as a fuel by the permittee. Separate truckloads may have identical documentation from the supplier if 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., 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 certificate of analysis shall be reviewed by the permittee to ensure that the RUO properties and constituents do not exceed any of the used oil specifications contained in the following table prior to acceptance and off-loading of the shipment.

**TABLE 1 - ALLOWABLE LEVELS FOR RUO**

<b>Property/Constituent</b>	<b>Allowable Level</b>
Higher Heating Value	17,000 Btu per pound (minimum)
Arsenic	5.0 ppmw (maximum)
Cadmium	2.0 ppmw (maximum)
Chromium	10.0 ppmw (maximum)
Lead	100.0 ppmw (maximum)
Sulfur	1.5 percent (maximum)
Polychlorinated Biphenyls (PCBs)	1.0 ppmw (maximum)
Total Halogens	4,000 ppmw (maximum)

**Verification:** Shipping records for each load received shall 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." The sample shall be screened for Total Halogens using SW-846 Method 9077.

**Verification:** Records of the Total Halogens test results shall be maintained a minimum of 5 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 certificate of analysis for the batch. The laboratory analysis shall include the properties and constituents listed in Table 1. 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.

## Appendix D – Continued

Any independent laboratory used by the facility for RUO analysis shall develop a Quality Assurance Plan (QAP). 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. The facility shall maintain a copy of the approved QAP on site or at the corporate offices and be available for AQD inspection.

### 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.**

For a single batch of RUO, the laboratory analysis shall 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 supplier's 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 required to complete the quarterly sample analysis in Method 2.

**Verification:** A list of RUO batches that have been pre-qualified, along with records of the RUO analytical data from both the supplier and the permittee for the same batch, shall be maintained a minimum of five years.

#### **Method 2 - On-Site Qualification: For all shipments which are not a pre-qualified batch, a quarterly split sample analysis is required.**

When the permittee accepts RUO that is not pre-qualified by Method 1, 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 accepted by the permittee that are not pre-qualified by Method 1. 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 records of the RUO analytical data from both the supplier and the permittee for the same batch, shall be maintained a minimum of five years.

AQD No. 34-2014

Exhibit C

Jonesville facility, SRN: N7740

PTI No. 369-06A

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

February 6, 2014

**PERMIT TO INSTALL**  
369-06A

**ISSUED TO**  
Gerken Materials, Inc.

**LOCATED AT**  
1660 East Chicago Road/US12  
Jonesville, Michigan

**IN THE COUNTY OF**  
Hillsdale

**STATE REGISTRATION NUMBER**  
N7740

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 Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. 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:

**January 14, 2014**

DATE PERMIT TO INSTALL APPROVED:

**February 6, 2014**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

## PERMIT TO INSTALL

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
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
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	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	ng	Nanogram
MAP	Malfuction Abatement Plan	NO <sub>x</sub>	Oxides of nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch, absolute
PTI	Permit to Install	psig	Pounds per square inch, gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur dioxide
SCR	Selective Catalytic Reduction	THC	Total hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile organic compound
VE	Visible Emissions	yr	Year

\* 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 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, 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 and 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 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). **(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 SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EUHMAPLANT	Hot mix asphalt (HMA) facility including: Aggregate conveyors 10,000 lb batch tower 250 TPH capacity Fabric filter dust collector	FGFACILITY
EUYARD	Fugitive dust sources including: Plant roadways Plant yard Material storage piles Material handling operations (excluding cold feed aggregate bins)	FGFACILITY
EUACTANKS	Liquid asphalt cement storage tanks with a vapor condensation and recovery system.	FGFACILITY
EUSILOS	Two 150 ton Hot Mix Asphalt (HMA) paving material product storage silos permitted in 1990 with no emission control. Addition of emission capture system for the top of each storage silo and loadout emission control.	FGFACILITY

**The following conditions apply to: EUHMAPLANT**

**DESCRIPTION:** Hot mix asphalt facility including aggregate conveyors and 250 TPH capacity batch mix plant

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.04 gr/dscf	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	40 CFR 60, Subparts A & I
2. PM	0.04 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(1)(a), R 336.1205(3)
3. CO	0.20 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13, SC VI.8, SC VI.9	R 336.1205(1)(a), R 336.1205(3), R 336.1224, R 336.1225, R 336.1702
4. SO <sub>2</sub>	0.18 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(1)(a), R 336.1205(3)
5. NO <sub>x</sub>	0.12 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(1)(a), R 336.1205(3)
6. Lead	2.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1205(1)(a), R 336.1205(3)
7. Benzene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
8. Toluene	0.006 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
9. Ethylbenzene	0.005 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
10. Xylene	0.005 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
11. Naphthalene	0.001 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
12. Formaldehyde	0.01 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
13. Acrolein	0.0008 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1225
14. Arsenic	1.0×10 <sup>-6</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
15. Nickel	1.0×10 <sup>-4</sup> lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
16. H <sub>2</sub> SO <sub>4</sub>	0.015 lb per ton <sup>a</sup>	Test Protocol*	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
17. Manganese	5.0×10 <sup>-5</sup> lb per ton <sup>a</sup>	Test Protocol <sup>*</sup>	EUHMAPLANT	GC 13 SC VI.8	R 336.1224, R 336.1225
<sup>a</sup> Pound pollutant per ton of HMA paving material produced. <sup>*</sup> Test Protocol shall specify averaging time.					

**II. MATERIAL LIMITS**

- The permittee shall not burn any fuel other than No. 2 fuel oil, No. 4 fuel oil, blended fuel oil, RUO or natural gas in EUHMAPLANT. **(R 336.1224, R 336.1225, R 336.1702)**
- 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, or ash content vary from the standards specified in the following table. **(R 336.1201(3), 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	1.0	Weight %
Minimum Flash Point	100.0	°F
Maximum Ash Content	1.0	Weight %

- The permittee shall not use any asbestos tailings or waste materials containing asbestos in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. **(R 336.1225, 40 CFR Part 61 Subparts A & M)**
- The permittee shall limit the asphalt mixture processed in EUHMAPLANT to a maximum of 50 percent RAP material or 50 percent recycled shingles material or any combination of the two materials that is equivalent to 50 percent of the asphalt mixture, based on a monthly average. **(R 336.1224, R 336.1225, R 336.1702)**
- The permittee shall not process more than 100,000 tons of HMA 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))**
- The permittee shall not process more than 250 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)**

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- The permittee shall not operate EUHMAPLANT unless the Fugitive Dust Control Plan for EUYARD specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**
- The permittee shall not operate EUHMAPLANT unless the Preventative Maintenance Program specified in Appendix B has been implemented and is maintained. **(R 336.1910, R 336.1911)**

3. The permittee shall not operate EUHMAPLANT unless the Emission Abatement Plan for Startup, Shutdown and Malfunctions specified in Appendix C has been implemented and is maintained. **(R 336.1911, R 336.1912)**
4. The permittee shall not operate EUHMAPLANT unless the Compliance Monitoring Plan (CMP) for RUO specified in Appendix D, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. **[R 336.1201(3), R 336.1225, R 336.1371, R 336.1372, R 336.1910, R 336.1911, Act 451 324.5521, 40 CFR 60.50c(c)]**
5. The permittee shall maintain the efficiency of the EUHMAPLANT batch plant burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. This shall be done at the start of each paving season or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. **(R 336.1205)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EUHMAPLANT unless the knockout box and fabric filter dust collector are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 2 and 10 inches of water column. The minimum pressure drop shall not be less than 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD. **(R 336.1910)**
2. 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 336.1224, R 336.1225, R 336.1702)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Verification and quantification of odor emissions from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, may be required for continued operation. Within 60 days upon notification from AQD District Supervisor, a complete stack sampling and odor threshold analysis plan using the Dynamic Dilution Method shall be submitted to the AQD. The stack sampling plan shall include provisions for various fuel usages, plant operating conditions, and odor neutralizer system operation (if any). 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 from notification from the AQD District Supervisor. **(R 336.1901, R 336.2001, R 336.2003, R 336.2004)**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1201, R 336.1205(1)(a))**
2. The permittee shall monitor, in a satisfactory manner, the virgin aggregate feed rate and the RAP feed rate to the EUHMAPLANT on a continuous basis. **(R 336.1224, R 336.1225, R 336.1702)**

3. 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. The CO emissions should be less than 500 ppmv to ensure EUHMAPLANT is operating properly. 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(3), R 336.1224, R 336.1225, R 336.1702)**

4. 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. The permittee shall keep records of all source emissions data and operating information on file and make them available upon request. **(40 CFR Part 60 Subparts A & I)**

5. The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all batch plant/burner and fabric filter dust collector 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 specified in Appendix B. All records shall be kept on file and made available to the Department upon request. **(R 336.1910, R 336.1911)**

6. The permittee shall keep the following records for each calendar month 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, which shall be provided by the supplier.
- c) Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP.

All records shall be kept on file 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)**

7. The permittee shall keep intermittent daily records of the following production information for EUHMAPLANT:

- a) The virgin aggregate feed rate.
- b) The RAP feed rate.
- c) The asphalt paving material product temperature.
- d) Information sufficient to identify all components of the asphalt paving material mixture.

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)**

8. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs 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 and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**

9. The permittee shall keep records, as described in SC VI.3, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to ensure proper operation of the batch plant or associated burner. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)**
10. The permittee shall keep, in a satisfactory manner, average daily, 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 and made available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3))**

## **VII. REPORTING**

N/A

## **VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVHMAPLANT	27 by 72	60	R 336.1225

## **IX. OTHER REQUIREMENTS**

N/A

### **Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).



**The following conditions apply to: EUYARD**

**DESCRIPTION:** Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins)

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** N/A

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUYARD unless the fugitive dust control plan specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1371, R 336.1372)**
2. The permittee shall calculate in a satisfactory manner, the annual fugitive dust emissions. 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)**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUACTANKS**

**DESCRIPTION:** Liquid asphalt cement storage tanks

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Vapor condensation and recovery system

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. **(R 336.1224)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**The following conditions apply to: EUSILOS**

**DESCRIPTION:** Hot Mix Asphalt (HMA) paving material product storage silo

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes but is not limited to operating the emission capture system per manufacturer specifications which shall be maintained on site and made available to the Department upon request. **(R 336.1224, R 336.1910)**
2. The permittee shall not operate FGFACILITY unless all the silo and batch tower loadout activities occur in a partially enclosed area from which the emissions are captured and ducted through the loadout system baghouse control device, and the loadout control system is installed, maintained, and operated in a satisfactory manner. **(R 336.1910, R 336.1901)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

**FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUHMAPLANT EUYARD EUACTANKS EUSILOS

**The following conditions apply Source-Wide to: FGFACILITY**

**POLLUTION CONTROL EQUIPMENT:** Emission capture system (top of silo) and load-out control, Vapor condensation and recovery system, Fabric filter dust collector

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3))

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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 monitoring/recordkeeping special condition. **(R 336.1201)**
2. The permittee shall keep the following information on a rolling 12-month rolling time period basis for FGFACILITY:
  - a) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - b) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

If stack test results for FGFACILITY 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 FGFACILITY. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(3))**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).



## **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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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 controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method 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.
- 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.

### **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 2 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD.
- 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 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.

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**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 the MDEQ.

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**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.

## **Appendix B - Continued**

### **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 the EPA Method 9 observation, if any. Any such visible emission shall be recorded in the Daily Operations Log Book and made available upon request to the AQD.
- All significant maintenance activities performed on the fabric filter dust collector.

## **Appendix C**

### **EMISSION ABATEMENT PLAN FOR STARTUP, SHUTDOWN AND MALFUNCTIONS**

#### **NORMAL STARTUP PROCEDURE**

The plant computer controls plant startup. At startup the plant operator will enter the mix design, the tons per hour and the number of tons to be produced into the plant operations computer. Once the operator starts the equipment the computer will start the cold feed bins and set the feed rate (tons per hour) requested. The feed rate will be different for each mix design and production rate.

When the plant computer senses that aggregate is crossing over the belt scale, a timer that has been previously calibrated for the particular mix, starts to count down. When the timer reaches zero the asphalt is started and fed to the pugmill. The two products (aggregate and asphalt cement) meeting together at the correct time will eliminate most dust that would escape from the mixing process.

Material that is discharged at startup is removed by way of the drag slat and discharge gate. This material is dropped into a loader bucket, dump truck or a holding area. The material is then moved to the recycle pile. The drop height from the discharge gate is kept to the very minimum to keep any escaping dust from blowing.

#### **NORMAL SHUTDOWN PROCEDURE**

When shutting down the mixing operation, the plant computer stops the cold feed bins first. Material that is in process is allowed to proceed down the weigh belt. When the weigh belt senses that all material has cleared the belt a timer starts counting down to shut off the asphalt cement. This timer allows all of the aggregate to clear the batch plant and enter the pugmill. The asphalt cement is timed for each mix design so that the last of the aggregate and the asphalt cement meet at the pugmill together.

Any mix that is waste is discharged into the loader bucket, dump truck or into a holding area under the drag slat discharge gate and is taken to the RAP pile for later crushing

#### **HOT STOPS - HOT STARTS**

If the silos become too full, the plant operator may have to make a hot stop, (batch plant and pugmill full of material). No material is discharged during a hot stop. The plant can remain in this mode for up to two hours. After a hot stop, the plant will make a hot start. The exhaust fan and burner will be started and once running, the rest of the plant will be started. Cold or off-spec material is discharged through the drag slat discharge gate and placed in the RAP pile for later use.

#### **MALFUNCTION STOPS**

If a malfunction (computer or mechanical) occurs during drying/mixing operations, a hot stop will be initiated until the problem is corrected. If the problem cannot be corrected and the batch plant/pugmill must be emptied, the asphalt cement can be controlled manually. This will be done only after all attempts to correct the problem are exhausted. If the asphalt pump fails and cannot be repaired, the batch plant will be emptied of mixed material until the discharged aggregate gets dusty. The batch plant will then be stopped and the asphalt pump repaired. A water supply at each location can be used to knock down any blowing dust.

#### **IDENTIFICATION OF SUPERVISORY AND MAINTENANCE PERSONNEL**

An updated list of current supervisory and maintenance personnel shall be kept at the plant. Descriptions of the responsibilities of these individuals for operation of the plant during startups, shutdowns, or malfunctions, as well as inspections and repairs, shall be stated on the updated list.

### Appendix C – Continued

#### DESCRIPTION OF INSPECTED ITEMS

A daily walk around inspection will be done each morning while the plant is warming up. After startup, observations will be carried out continuously throughout the day by the plant operator and the loader operator during operations. The following items shall be inspected/observed:

- Roadways (fugitive dust)
- Cold feed bins (falling aggregate)
- Aggregate feed belts (falling aggregate)
- Dryer (seals for dust escaping)
- Bucket elevator (seals for dust escaping)
- Aggregate chutes (seals for dust escaping)
- Screen (door seals for dust escaping)
- Weigh hopper (seals for dust escaping)
- Mixer (seals for dust escaping)
- Baghouse stack (opacity)
- Baghouse screws (shaft and door seals for dust escaping)
- Chutes, screw augers, and housings (for any leaks)

A more thorough inspection will be done during the winter shutdown (between December 1 and April 1) for maintenance and repairs. The following items will be inspected and repairs made as needed:

- Cold feed bins (seals and belts rollers)
- Belt lines (belts and rollers)
- Dryer (shell, seals, flights)
- Bucket elevator (chain, buckets, bearings, seals)
- Chutes (liners, seals)
- Screen (door seals, fugitive ductwork)
- Weigh hopper (seals, calibration)
- Mixer (seals, wear plate)

The baghouse will get a thorough inspection from the front inlet to the rear exhaust fan. This inspection will be done every spring before the paving season starts. (Additional visual inspections may be required before and during the paving season as required by Appendix B). The following items to be inspected are:

- Ductwork (inspected for thickness, will it last for the season)
- Blow pipes, diaphragm valves (are they working, good connections)
- Bags and cages (condition of bags, age, number replaced during last season)
- Dust screws - shaft seals and screw cover doors

#### REPLACEMENT PARTS

As required by Appendix B, the following shall be kept in stock at all times:

- A minimum of 15 bags.
- A minimum of 5 pounds of black light powder. (Recommended quantity for the number of square feet of baghouse cloth.)
- A minimum of two (2) tubes of silicone caulk for minor leaks around doors and seals.

## Appendix C – Continued

### **BAGHOUSE VARIABLES AND MONITORING**

The baghouse is monitored continuously (as specified in Appendix B) by the use of a magnehelic gage. The pressure differential between the dirty and clean side of the baghouse shall be maintained above 2 inches water gauge. If the pressure rises above 10 inches water gauge, signaling an inoperative diaphragm valve, the plant shall be stopped and the defective valve repaired or replaced. If the differential pressure drops below 2 inches water gauge the company shall inspect for a torn bag or a problem with the tubesheet between the dirty and clean side of the baghouse. This problem will also result in a dirty stack. The only time the baghouse will normally drop below 2 inches water gauge is if a large number of filter bags are replaced.

If a large number of bags are replaced (over 100) the pressure on the magnehelic will drop slightly. This drop will only last for a day or less depending on the production.

Monitoring of the baghouse is done by observation, magnehelic or by the high temperature alarm that is set to go off at a stack temperature of 375/400 degrees Fahrenheit.

### **CORRECTIVE PROCEDURES AND RESPONSIBLE PERSONS**

This startup, shutdown, malfunction plan shall be followed to meet the compliance limits. If the limits are exceeded it is the responsibility of the plant supervisor, or in his absence the plant operator, to stop the plant and correct the problem immediately. Rule 336.1912 shall be followed when abnormal conditions exist.

### **DRUM MIX AND BATCH - NORMAL STARTUP PROCEDURES**

During startup, operation and shutdown the following items will be monitored continuously:

**Stack Temperature** - As material starts through the plant the temperature must be brought up slowly by manually adjusting the burner. As the operator opens the burner, the exhaust fan damper must also be opened to maintain one quarter to one half inch of suction on the burner end of the batch plant.

**Mix Temperature** - As material starts flowing through the plant it is critical to watch mix discharge temperature in addition to the stack temperature. A discharge temperature that is too high will cause blue smoke. A temperature that is too low will produce an unacceptable product.

**Exhaust Magnehelic** - As material is fed into the batch plant and the burner is opened up, the differential pressure in the baghouse will increase. As the plant reaches normal operating parameters the pressure differential will settle between 2 and 10 inches water gauge. The differential pressure can be adjusted by opening or closing the exhaust damper. The operator shall keep between one quarter and one half-inch draw on the burner end for maximum efficiency.

Along with monitoring the above items the operator shall monitor the weather to determine any changes to the moisture levels in the aggregate and RAP. The moisture content determines how to adjust the burner to reach the desired mix discharge temperature.

Appendix D

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

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

Each shipment from the used oil supplier must be accompanied by documentation demonstrating that the used oil meets specification levels in 40 CFR 279.11 (Standards for the Management of Used Oil) and R 299.9809, promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The documentation shall include supplier certification and analytical data. The analysis must be for the batch of used oil accepted for use as a fuel by the permittee. Separate truckloads may have identical documentation from the supplier if 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., 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 certificate of analysis shall be reviewed by the permittee to ensure that the RUO properties and constituents do not exceed any of the used oil specifications contained in the following table prior to acceptance and off-loading of the shipment.

**TABLE 1 - ALLOWABLE LEVELS FOR RUO**

<b>Property/Constituent</b>	<b>Allowable Level</b>
Higher Heating Value	17,000 Btu per pound (minimum)
Arsenic	5.0 ppmw (maximum)
Cadmium	2.0 ppmw (maximum)
Chromium	10.0 ppmw (maximum)
Lead	100.0 ppmw (maximum)
Sulfur	1.0 percent (maximum)
Polychlorinated Biphenyls (PCBs)	1.0 ppmw (maximum)
Total Halogens	4,000 ppmw (maximum)

**Verification:** Shipping records for each load received shall 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." The sample shall be screened for Total Halogens using SW-846 Method 9077.

**Verification:** Records of the Total Halogens test results shall be maintained a minimum of 5 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 certificate of analysis for the batch. The laboratory analysis shall include the properties and constituents listed in Table 1. 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.

## Appendix D – Continued

Any independent laboratory used by the facility for RUO analysis shall develop a Quality Assurance Plan (QAP). 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. The facility shall maintain a copy of the approved QAP on site or at the corporate offices and be available for AQD inspection.

### 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.**

For a single batch of RUO, the laboratory analysis shall 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 supplier's 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 required to complete the quarterly sample analysis in Method 2.

**Verification:** A list of RUO batches that have been pre-qualified, along with records of the RUO analytical data from both the supplier and the permittee for the same batch, shall be maintained a minimum of five years.

#### **Method 2 - On-Site Qualification: For all shipments which are not a pre-qualified batch, a quarterly split sample analysis is required.**

When the permittee accepts RUO that is not pre-qualified by Method 1, 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 accepted by the permittee that are not pre-qualified by Method 1. 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 records of the RUO analytical data from both the supplier and the permittee for the same batch, shall be maintained a minimum of five years.