

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

Ladd Construction Company  
Attn: Mr. James D. Walsh, Vice President  
P.O. Box 306  
Ladd, Illinois 61329

Application No.: 72101140                      I.D. No.: 103810AAC  
Applicant's Designation:                      Date Received: May 11, 1999  
Subject: Asphalt Production  
Date Issued: November 4, 1999              Expiration Date: November 4, 2004  
Location: RFD, Lee Center

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of conventional asphalt plant with a fuel oil fired rotary dryer controlled by a cyclone and scrubber, one fuel oil storage tank (1,000 gal), and two (2) 20,000 gallon hot asphalt storage tanks with fuel oil fired heaters pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of nitrogen oxides from the asphalt plant to less than the major source threshold, as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. For purposes of fees pursuant to Sections 9.6 and 39.5 of the Environment Protection Act, annual emissions of specified air contaminants, i.e., particulate matter, carbon monoxide, nitrogen oxides, volatile organic material, and sulfur dioxide, shall not exceed 100 tons, which shall be the permitted emissions of these pollutants.
- 3a. Operation of the Asphalt Plant shall not exceed the following limits:  
  
Asphalt Concrete Production Rate: 300 tons/hr and 100,000 tons/yr  
Dryer Fuel Usage: 750 gal/hr and 250,000 gal/yr  
Asphalt Tank Heater Fuel Usage: 900 gal/mo and 9,000 gal/yr
- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4a. Within 90 days of a written request from the Illinois EPA, pursuant to 35 Ill. Adm. Code Section 201.282, the emissions and opacity of the exhaust from the plant shall be measured by an approved testing service, during conditions which are representative of the maximum performance. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.

b. i. The following methods and procedures shall be used for testing of emissions. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Particulate Matter	USEPA Method 5
Sulfur Dioxide	USEPA Method 6
Nitrogen Oxide	USEPA Method 7
Opacity	USEPA Method 9
Carbon Monoxide	USEPA Method 10

ii. A test shall consist of three separate runs each at least 60 minutes in duration. Compliance shall be determined from the average of the runs provided that the Illinois EPA may accept the arithmetic mean of the two runs in circumstances described in 40 CFR 60.8(f).

c. Testing shall be performed by a qualified independent testing service.

d. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. A copy shall also be submitted to the USEPA. This plan shall describe the specific procedures for testing, including:

i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.

e. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date of testing shall be submitted a minimum of five (5) working days prior to the actual date of the tests. The

Illinois EPA may, at its discretion, accept notification with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.

5. The Permittee shall maintain monthly records of the following items:
  - a. Asphalt concrete production (tons/month and tons/yr).
6. The records required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.
7. If the rotary dryer control system is not operating properly while the dryer is operated or there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a quarterly report to the Illinois EPA's Compliance Monitoring Section in Springfield, Illinois, within 30 days after the end of the quarter. The report shall include the emissions on an hourly basis, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including material handling or storage activity, beyond the property line of the emission source, pursuant to 35 Ill Adm. Code 212.301.
9. The transportation and assembly of this plant at a new location will require a new construction and operating permit for the new location. This permit must be obtained prior to commencing construction at the new location.
10. This permit supersedes the current permit(s) issued for this location.
- 11a. The Permittee shall maintain operating and maintenance logs for the dryer control system, including: maintenance activities, with date and description of inspections, repair actions, and equipment replacements, etc.
  - b. These records shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request.
- 12a. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:

- i. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
- ii. A summary of results;
- iii. Description of test procedures, including description of sampling points, test equipment, and test schedule;
- iv. Detailed description of test conditions, including:
  - A. Process information, i.e., process rate, aggregate type, fuel type, and firing rate.
  - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

b. Submittals of information shall be made as follows:

- i. Notices of Test - one copy to Source Emission Test Specialist and one copy to the Regional Office.
- ii. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.

Illinois Environmental Protection Agency  
Division of Air Pollution Control - Regional Office  
5415 North University  
Peoria, Illinois 61614

Illinois Environmental Protection Agency  
Attn: Source Emission Test Specialist  
Division of Air Pollution Control  
The Eisenhower Tower  
1701 First Avenue  
Maywood, Illinois 60153

13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: asphalt production and fuel consumption from the prior calendar year. If there have been no exceedances during the prior calendar year the Annual Emissions Report shall include a statement to that effect.
- 14a. Organic liquid by-products or waste materials shall not be used at this source without written approval from the Illinois EPA.

- b. The Permittee shall notify the Illinois EPA prior to any change in the type of fuel used at the source.
  
- 15. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.

It should be noted that the company has substantially reduced its production and emission limits, qualifying for the minimum site fee.

If you have any questions on this, please call Jim Kallmeyer at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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Attachment

cc: Illinois EPA, FOS Region 2  
Compliance Section  
USEPA

Attachment A - Emissions Summary

1a. Emissions from the Asphalt Plant:

Asphalt Plant (100,000 tons/year throughput):

<u>Dryer Fuel Usage</u>	<u>Pollutant</u>	<u>Emission Rate</u>	<u>Annual Emissions</u>
250,000 gal/year	PM	0.040 lb/ton	2.0 ton/year
	VOM	0.028 lb/ton	1.4 ton/year
	CO	0.69 lb/ton	3.5 ton/year
	SO <sub>2</sub>	42.6 lb/10 <sup>3</sup> gal	5.4 ton/year
	NO <sub>x</sub>	0.17 lb/ton	8.5 ton/year

Asphalt Storage Tank:

<u>Heater Fuel Usage</u>	<u>Pollutant</u>	<u>Emission Rate</u>	<u>Annual Emissions</u>
9,000 gal/year	NO <sub>x</sub>	20.00 lb/10 <sup>3</sup> gal	0.2 ton/year
	SO <sub>2</sub>	42.60 lb/10 <sup>3</sup> gal	0.4 ton/year

These tables define the potential emissions of the plant and are based on the actual emissions determined from hourly unit capacity, the combustion of #2 fuel oil, and standard emission factors.

b. Particulate Matter Fugitive Emissions

Includes emissions from handling and erosion of storage piles, and paved and unpaved plant road traffic: 0.8 tons/yr.

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