

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

E.T. Simonds Construction Company  
Attn: William L. Bost  
1500 North Oakland Avenue  
Carbondale, IL 62901

Application No.: 72110669                      I.D. No.: 069852AAF  
Applicant's Designation: ASPHALT            Date Received: February 15, 2000  
Subject: Asphalt Plant  
Date Issued: September 7, 2000            Expiration Date: September 7, 2005  
Location: Routes 1 & 146, Cave in Rock

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a conventional asphalt plant with a distillate oil fired rotary drier, a cyclone and a baghouse, asphalt storage tanks, and distillate fuel oil storage tank 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 and sulfur dioxide from the asphalt plant to less than major source thresholds, 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.
- c. This permit supersedes the current permit(s) issued for this location.
- 2a. Operation of the Asphalt Plant shall not exceed the following limits:  

Asphalt Concrete Production Rate: 250 tons/hr and 145,000 tons/yr  
Dryer Firing Rate: 75 mmBtu/hr  
Asphalt Tank Heater Firing Rate: 2.26 mmBtu/hr
- b. At the above location, the Permittee shall not keep, store, or utilize a fuel with a sulfur content greater than 0.3 weight percent.
- c. The Agency shall be allowed to sample all fuels stored at the source.
- d. 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.

3a. Within 90 days of a written request from the Agency, 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 Agency 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.

Opacity	USEPA Method 9
Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Particulate Matter	USEPA Method 5

- 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 Agency 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 Agency 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 Agency shall be notified prior to these tests to enable the Agency 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 Agency may, at its discretion, accept notification with shorter advance notice provided that the Agency will not accept such notifications if it interferes with the Agency's ability to observe the testing.

4. The Permittee shall maintain operating logs for:

- a. The rotary dryer control system, including: operating data, with pressure drop and stack condition, on daily startup and every four hours thereafter.
- b. The Permittee shall maintain hourly records of the following items:
  - i. Asphalt dryer raw material feed rate (tons/hour);

- ii. Type of aggregate processed including slag and recycled material;
  - iii. Asphalt dryer firing rate (mmBtu/hr) (or (c)(ii) below).
- c. The Permittee shall maintain daily records of the following items:

- i. Asphalt concrete production (tons/day);
  - ii. Asphalt dryer fuel type and consumption (gallons day) (or (b)(iii) above).
- d. The Permittee shall maintain monthly records of the following items:
  - i. Asphalt concrete production (tons/month and tons/yr);
  - ii. Asphalt tank heater fuel type and consumption (gallons/month);
5. All 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 Agency and USEPA upon request.
6. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Agency's Compliance and Systems Management Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance and Systems Management Section  
P.O. Box 19276  
Springfield, IL 62794-9276
7. 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.
8. The assembly of this plant at a new location will require a construction permit for the new location. This permit must be obtained prior to commencing construction at the new location.

The following special conditions are not federally enforceable:

- 9a. 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 Agency upon request.

- 10a. 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 Agency 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  
2009 Mall Street  
Collinsville, Illinois 62234

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

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: asphalt production, aggregate 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.

12a. Organic liquid by products or waste materials shall not be used at this

source without written approval from the Agency.

- b. The Permittee shall notify the Agency prior to any change in the type of fuel used at the source.

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13. 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.
14. The following Standard Conditions are not federally enforceable:  
Standard Conditions 3(a), 8, 9, 10, and 11.

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

DES:JDK:psj

Attachment

cc: IEPA, FOS Region 3  
IEPA, CASM  
USEPA

Attachment A - Emissions Summary

1. Emissions from the Asphalt Plant:

<u>Throughput</u>	<u>Pollutant</u>	<u>Emission Rate</u> <u>(lb/ton)</u>	<u>Annual Emissions</u> <u>(ton/year)</u>
145,000 ton/yr (asphalt)	PM	0.085	6.2
	VOM	0.034	2.5
	CO	0.069	5.0
	SO <sub>2</sub>	0.24	17.4
	NO <sub>x</sub>	0.17	12.4

Asphalt Storage Tank Heater:

<u>Input</u>	<u>Pollutant</u>	<u>Emission Rate</u> <u>(lb/1000 gal)</u>	<u>Annual Emissions</u> <u>(ton/year)</u>
20,400 (gal/yr) (fuel oil)	NO <sub>x</sub>	20.0	0.20
	SO <sub>2</sub>	42.6	0.43

This table defines the potential emissions of the plant and is based on the actual emission determined from hourly unit capacity, the combustion of distillate fuel oil, emission standards, if applicable, and standard emission factors.

3. Particulate Matter Fugitive Emissions

Includes emissions from handling and erosion of storage piles, and paved and unpaved plant road traffic: 10 tons/yr.

DES:JDK:psj