

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL
NSPS SOURCE

PERMITTEE

Harry W. Kuhn, Inc.
Attn: Mr. Albert D. Molyneaux, Plant Superintendent
28W651 North Avenue
West Chicago, Illinois 60185

<u>Application No.:</u> 88030024	<u>I.D. No.:</u> 043090ABO
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 26, 2000
<u>Subject:</u> Asphalt and Crushing Plants	
<u>Date Issued:</u> December 12, 2000	<u>Expiration Date:</u> December 12, 2005
<u>Location:</u> 1555 West Washington Street, West Chicago	

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a gas-fired, drum mix asphalt plant with baghouse, a fixed crushing plant, and a portable crushing plant, as described in 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 carbon monoxide (CO) and volatile organic materials (VOM) from the gas-fired drum mix asphalt and the crushing plants to less than major source thresholds, as further described in Attachment A. As a result, the source is excluded from the 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. The asphalt plant is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and I. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The emissions from the asphalt plant shall not contain particulate matter in excess of 0.04 gr/dscf and shall not exhibit 20% opacity or greater pursuant to 40 CFR 60.92.
- c. The Permittee shall maintain and operate the asphalt plant, including associated air control equipment, in a manner consistent with good air pollution control practice for minimizing emissions pursuant to 40 CFR 60.11(d).

3. Emissions and operation of the asphalt plant shall not exceed the following limits:

Asphalt Production	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
150,000	900,000

<u>Pollutant</u>	<u>Emission Factor</u> (Lb/Ton)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
CO	0.056	4.2	25.2
VOM	0.030	2.3	13.5
NO _x	0.030	2.3	13.5
PM	0.018	1.4	8.1
SO ₂	0.0033	0.3	1.5

These limits are based on maximum asphalt production and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 4a. The crushing plants are subject to New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and OOO. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Fugitive emissions of particulate matter from the crushers (except from truck dumping), shall not exceed 15 percent opacity (40 CFR 60.672(c) and (d)).
- c. Water sprays shall be used on the crushers, screens, conveyors, stockpiles, and roadways to produce a moisture content of 1.5% by weight or higher.
- d. The aggregate shall be tested once a month during operating time using ASTM Procedures (C566-67) to determine the moisture content in percent by weight.
- e. At all times the Permittee shall also, to the extent practicable, maintain and operate these sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- 5a. Emissions and operation of the fixed crushing plant shall not exceed the following limits:

<u>Aggregate Throughput</u>	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
80,000	480,000

<u>Equipment</u>	<u>Emission Factor</u> (Lb/Ton)	<u>PM Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
1 Crusher	0.0007	0.03	0.17
1 Screens	0.0018	0.07	0.44
Up to 10 Conveyors	0.0001	0.04	0.24

These limits are based on maximum aggregate throughput and standard AP-42 controlled emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Emissions and operation of the portable crushing plant shall not exceed the following limits:

Aggregate Throughput			
<u>(Ton/Mo)</u> <u>(Ton/Yr)</u>			
100,000		583,200	
<u>Equipment</u>	<u>Emission Factor</u> <u>(Lb/Ton)</u>	<u>PM Emissions</u>	
		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
2 Crushers	0.0007	0.07	0.42
4 Screens	0.0018	0.35	2.1
16 Conveyors	0.0001	0.08	0.47

These limits are based on maximum aggregate throughput and standard AP-42 controlled emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 6a. Within 90 days from receipt of this Permit, pursuant to 35 Ill. Adm. Code Section 201.282, the opacity from the 360 ton/hr crushing plant shall be measured during conditions which are representative of 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. The following method and procedure shall be used for testing of emissions. Refer to 40 CFR 60, Appendix A for USEPA test method.

Opacity	USEPA Method 9
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- c. 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).
- d. Testing shall be performed by a qualified independent testing service.
- e. 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 be submitted to the USEPA. This plan shall describe the specific procedure 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 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.

- f. 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. Notification of the actual date and expected time 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.
- 7a. The Permittee shall maintain operating logs for the following:
 - i. The asphalt plant dryer control system, including operating date (pressure drop and stack condition), daily upon startup and every four hours thereafter (only during times of actual operation).
 - b. The Permittee shall maintain daily and monthly records of the following items:
 - i. Asphalt production (tons).
 - ii. Aggregate production (tons).
8. The records required in Condition 7 shall be retained at an 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.
9. 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 Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with 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
Division of Air Pollution Control
Compliance Unit (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- The condition that requires a source to report any exceedances does not authorize continued operation during such event.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing, or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

11. 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.
12. The transportation and assembly of the asphalt or crushing plants to a new location will require a new Construction and Operating Permit for the new location. This permit must be obtained prior to reassembling the plant at the new location.
13. The Illinois EPA is to be notified in writing within five (5) days of any relocation of the movable processing equipment covered by this permit to another permitted location. After operating the equipment at the other permitted location, the equipment may be returned to this location.
- 14a. The Permittee shall maintain operating and maintenance logs for the dryer control system including:
 - i. Maintenance activities with date and description of inspections, repairs, equipment or filter bag replacements, etc.
 - ii. Incidents of malfunction with date, duration, description, probable cause, and corrective actions.
- 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.
15. The Permittee shall submit the following additional information with the Annual Emissions Report due May 1st of each year: asphalt production, fuel consumption, aggregate production, and total particulate matter emissions from the calendar year. If there have been no exceedance during the prior calendar year, the Annual Emissions Report shall include a statement to that effect.
16. The Permittee shall notify the Illinois EPA prior to any change in the type of fuel used at the source.

It should be noted that the 2.82 mmBtu/hr gas-fired asphalt heater is exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 210.146(d).

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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:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, FOS - CMU

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the asphalt plant and the crushing plants operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of CO and 25 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions and operation of the asphalt plant shall not exceed the following limits:

	<u>Asphalt Production</u>			
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		
	150,000	900,000		
<u>Pollutant</u>	<u>Emission Factor</u>		<u>Emissions</u>	
	<u>(Lb/Ton)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
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VOM	0.030		2.3	13.5
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PM	0.018		1.4	8.1
SO ₂	0.0033		0.3	1.5

These limits are based on maximum asphalt production and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. Emissions and operation of the fixed crushing plant shall not exceed the following limits:

	<u>Aggregate Throughput</u>			
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		
	80,000	480,000		
<u>Equipment</u>	<u>Emission Factor</u>		<u>PM Emissions</u>	
	<u>(Lb/Ton)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
1 Crusher	0.0007		0.03	0.17
1 Screens	0.0018		0.07	0.44
Up to 10 Conveyors	0.0001		0.04	0.24

These limits are based on maximum aggregate throughput and standard AP-42 controlled emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emissions and operation of the portable crushing plant shall not exceed the following limits:

Aggregate Throughput

<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
100,000	583,200

<u>Equipment</u>	<u>Emission Factor</u> <u>(Lb/Ton)</u>	<u>PM Emissions</u>	
		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
2 Crushers	0.0007	0.07	0.42
4 Screens	0.0018	0.35	2.1
16 Conveyors	0.0001	0.08	0.47

These limits are based on maximum aggregate throughput and standard AP-42 controlled emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Fugitive PM emissions from traffic roads and stockpiles: 15.36 ton/year

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