



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korfeski, Director

July 29, 2008

**RE: Belmont County
Lash Paving Plant #2
0607000187
Compliance Test and Inspection
Correspondence**

CERTIFIED MAIL #70063450000190562963

Mr. David Lash, Jr.
Lash Paving, Inc.
P.O. Box 296
Colerain, Ohio 43917

Dear Mr. Lash:

The purpose of this letter is to relay the results of Ohio EPA's review of the recent stack test results submitted for Lash Paving Plant #2 and the findings of the compliance evaluation inspection conducted during the stack test.

On May 6, 2008, Grace Consulting, Inc. performed particulate, sulfur dioxide, carbon monoxide, nitrogen oxide, visible emissions and volatile organic compounds emission compliance tests at Lash Paving Plant #2, a 120 TPH portable drum mix asphalt plant (emissions unit P903) located on County Road 7 in Empire, Ohio (Jefferson County). Ohio EPA received the test report on July 10, 2008. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Methods 1-5, 6C, 7E, 9, 10 and 25. The results of the test showed the source to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

Pollutant:	Particulate	SO ₂	NO _x	VE	CO	VOC
Tested Emission Rate:	0.036 gr/dscf	3.5 lbs/hr	3.0 lbs/hr	13%	2.9 lbs/hr	9.1 lbs/hr
Allowable Emission Rate:	0.04 gr/dscf	11.2 lbs/hr	15.0 lbs/hr	20%	7.2 lbs/hr	13.8 lbs/hr
Source Operating Rate:	83 tons/hr					
Isokinetic Rate:	Run #1 - 96%; Run #2 - 98%; Run #3 - 97%					

Also on May 6, 2008, staff from the Division of Air Pollution Control, Southeast District Office, conducted a compliance evaluation inspection of Lash Paving Plant #2. The purpose of the inspection was to evaluate the facility's compliance with state and federal air pollution rules and regulations and the air permit-to-install (PTI) issued for this facility. Modified PTI #17-1543, an administrative modification of the PTI issued for this plant and its support units (emissions units P903, F003 and F004) on April 30, 1997, was issued on August 5, 1998. No permits-to-operate (PTOs) have been issued for these emissions units to date, but PTO applications were received January 28, 1997.

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Based on observations and records reviewed during the inspection, it appears that Lash Paving Plant #2 is in compliance with all applicable state and federal air pollution rules. Copies of the checklists completed as part of the inspection are enclosed.

Comments:

- (1) On March 3, 2008, Ohio EPA received your request to administratively modify PTI #17-1543 to correct the rating of the asphalt plant from 200 TPH to 120 TPH to reflect the actual plant capacity. In an email dated May 12, 2008 (copy enclosed), I asked for clarification of the applicable pressure drop range for the scrubber and whether you would like to request additional modifications to the permit to add synthetic minor operating restrictions and increase the percentage of reclaimed asphalt pavement (RAP) that can be used in this plant. To date, I have not received a response to this email, so please be advised that processing of the permit modification application has been placed on hold until the requested information is received.
- (2) The emissions limits in the current permit are based upon the AP-42 Section 11.1 that was effective in January of 1995. This section was modified in March of 2004, and the short term limits of 1.3 pounds per hour for SO₂ and 3.8 pounds per hour for VOC were calculated for a plant rated at 120 tons per hour. The recent stack test results revealed that these limits would be exceeded when slag is used as a raw material, thus the use of slag constitutes a Chapter 31 modification of this plant. If Lash Paving wishes to continue to use slag as a raw material in this plant, you must request a Chapter 31 modification of the permit so that the emissions levels achieved during the May 6, 2008 stack test can be incorporated into the permit for this emissions unit. Please note that Chapter 31 modification requests must be submitted using the permit-to-install and operate (PTIO) and applicable Emissions Activity Category (EAC) forms available at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>.

The assistance provided during the stack test and inspection is greatly appreciated. Should you have any questions, feel free to contact me at (740) 380-5245 or via email at kim.reinbold@epa.state.oh.us.

Sincerely,



Kimbra L. Reinbold
Division of Air Pollution Control
Southeast District Office

KLR/mlm

cc: Dean Ponchak, DAPC-SEDO w/ CETA summary attachment
Lisa Duvall, DAPC-SEDO
Test Report File Copy

DIVISION OF AIR POLLUTION CONTROL-SEDO
CETA APPENDIX K DATA
Stack Test Review Summary Form

FACILITY INFORMATION

FACILITY NAME: Lash Paving

COUNTY: Belmont

FACILITY ID: 0607000187

SCC: 3 05 002 03

EMISSION TEST INFORMATION

POLLUTANT(S) TESTED: particulate, Sulfur dioxide, carbon monoxide,
nitrogen oxides, visible emissions and volatile organic compounds

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: April 30, 2008

SCHEDULED TEST DATE FROM ITT: May 6, 2008

TESTING FIRM: Grace Consulting, Inc.

DATE TEST CONDUCTED: May 6, 2008

DAPC-SEDO TEST OVERSIGHT

NAME OF DAPC-SEDO STAFF WITNESS: Marco Deshales

WERE ALL RUNS WITNESSED? YES
*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE? YES

WERE AUDIT SAMPLES TAKEN? NO

EMISSION UNIT INFORMATION

EMISSION UNIT ID#: P903

EMISSION UNIT DESCRIPTION: hot mix asphalt plant

EMISSION UNIT MONITORING AND CONTROL

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: venturi scrubber

TEST REPORT

TEST REPORT REVIEWER: Lisa Duvall

DATE TEST REPORT RECEIVED AT SEDO: July 10, 2008

POLLUTANT: particulate TEST METHOD: 1-5
ALLOWABLE EMISSION RATE (UNITS): 0.04 gr/dscf
AVERAGE TEST EMISSION RATE (UNITS): 0.036 gr/dscf
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

POLLUTANT: sulfur dioxide TEST METHOD: 6C
ALLOWABLE EMISSION RATE (UNITS): 1.3 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 3.51 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

POLLUTANT: nitrogen oxides TEST METHOD: 7E
ALLOWABLE EMISSION RATE (UNITS): 6.6 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 3.04 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

POLLUTANT: visible TEST METHOD: 9
ALLOWABLE OPCACITY LIMIT (UNITS): 20%
6 MINUTE AVERAGE OPACITY (UNITS): 13%
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

POLLUTANT: carbon monoxide TEST METHOD: 10
ALLOWABLE EMISSION RATE (UNITS): 15.6 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 2.88 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

POLLUTANT: volatile organic compounds TEST METHOD:25
ALLOWABLE EMISSION RATE (UNITS): 3.8 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 9.07 lb/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 100 tons/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 83 tons/hr
TEST PASSED NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 25, 2008

I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:

- AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**
 AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY

July 18, 2008

Lisa Duvall

Date of Review

Reviewed by

