

SOUTHWEST REGIONAL OFFICE

MEMO

**TO** Air Quality Case File 04-730  
PA-04-00730

**FROM** Devin P. Tomko   
Air Quality Engineering Specialist  
Air Quality Program

**THROUGH** Mark R. Gorog, P.E.   
Environmental Engineer Manager  
Air Quality Program

**DATE** January 31, 2012

**RE** Initial Operating Permit Inspection  
**Lindy Paving Incorporated**  
**Big Beaver Borough/Koppel Asphalt Plant**  
Big Beaver Borough, Beaver County  
*AUTH: 952878, APS: 797724, PFID: 733773*

On February 8, 2011, Plan Approval PA-04-00730 was issued to Lindy Paving, Inc. (“Lindy”) for construction of the Big Beaver Borough (Koppel) Asphalt Plant, a 400 ton-per-hour (1,300,000 tons-per-year) hot-mix asphalt plant constructed at the corner of Shenango Road and PA-351 in Big Beaver Borough, Beaver County.

On Monday June 12, 2011, the Department received notification via email that the construction of the plant was completed and that operation commenced on June 13, 2011. The temporary period of operation for the plant began as indicated, and pursuant to 25 Pa. Code §127.12b(e) was valid for a limited time not to exceed 180 days. Plan Approval PA-04-00730 was modified according to Section B—Condition 3(e) therein to provide a 180-day period of temporary operation and a corresponding expiration date of December 13, 2011. On December 1, 2011, the Department authorized an extension of this Plan Approval for 180 days, with expiration date of June 13, 2012. Another 180-day extension of the plan approval was issued on May 29, 2012, with expiration date of December 13, 2012.

On August 4, 2011, the Department received a pre-test protocol for testing of the counter flow drum asphalt mixer at the plant. The protocol was reviewed by Darren Lauer of DEP’s Division of Source Testing and Monitoring, and a conditional protocol approval letter, dated August 26, 2011, was provided to Lindy. On September 27, 2011, the Department received a request from Lindy to postpone stack testing at this facility until 2012 due to problems with the drying of aggregate materials. As of December 1, 2011, this issue had been corrected by Gencor. Stack testing of the plant was conducted on May 30, 2012. The stack test report was received by the Department on October 4, 2012. Although official review of the test report is pending, the plant appears to be in compliance with all plan approval emission limitations.

On December 4, 2012, another 180-day extension of PA-04-00730 was issued to Lindy. This extension is necessary since an operating permit has not been issued to Lindy. An application for operating permit was received from Lindy on December 12, 2012.

On December 5, 2012, Scott Beaudway and Devin Tomko of the Department met with Scott White—Plant Manager and Paul Reiner—General Manager of Lindy to conduct the initial operating permit inspection of the facility. At the time of the inspection, the Department verified that all sources and controls authorized under PA-04-00730 were constructed as proposed. Lindy was in compliance with all conditions therein except that at

the time of the inspection, review of the stack test report by DEP Division of Source Testing and Monitoring was pending.

During the inspection, Lindy was informed that several conditions of the Plan Approval should not be included in the State Only Operating permit. The conditions and recommendations are as follows:

- Remove all conditions related to 40 CFR Part 98 Greenhouse Gas Reporting.

*According to a January 13, 2011 email to Mark Gorog from Kathleen Cox—Associate Director EPA Region III:*

“...the emission reporting requirements in Part 98 do not have to be included in a plan approval for any source...[since t]he GHG reporting rule is not an applicable requirement under title V....”

- Remove item (a)(v.) from Section E, Source Group Plan Approval Restrictions: *Hot Mix Asphalt Plant*, VII. Additional Requirements:

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# 004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

**Monitoring, Recordkeeping and Reporting**

a. The owner or operator shall maintain records including the following:

- i. Monthly and 12-month rolling total for asphalt production;
  - ii. Daily records shall be made available to the Department upon request;
  - iii. 12-month rolling total for gallons of No. 2 fuel oil and WDLF used;
  - iv. Hours operated while firing each liquid fuel;
  - v. ~~12-month rolling total for each pollutant listed;~~
  - vi. Daily baghouse pressure drop reading;
  - vii. Daily stack, fugitive and malodor surveys;
  - viii. Any corrective actions taken to bring facility back into compliance with stack, fugitive, and malodor requirements of this permit; and
  - ix. Records of tune-up and annual portable monitor testing done in accordance with the conditions of this authorization.
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Item v. above is unnecessary and redundant since in Section C, Site Level Plan Approval Restrictions, VII. Additional Requirements, Lindy is required to submit an annual source (AIMS) report, as follows:

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# 010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The reporting and recordkeeping requirements of 25 Pa Code §§135.1-135.5 are applicable to this facility. Each report shall include the quantity of the following pollutants emitted from the facility: carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM) including PM10 and PM2.5, sulfur dioxide (SO2), volatile organic compounds (VOCs), hazardous air pollutants (HAPs).

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Upon approval of the stack test report and concurrence with Lindy’s findings by the Source Testing Section, Lindy will have satisfied the plan approval stack testing requirements and demonstrated compliance with the prescribed emission limitations. I recommend that the above referenced changes be incorporated into OP-04-00730 for the Lindy Paving Inc., Big Beaver/Koppel Asphalt Plant upon issuance. This memo provides verification pursuant to 25 Pa. Code §127.443(c) that “...the source was constructed in accordance with the plan approval and the conditions of the plan approval” and as such, an operating permit may be issued for operation of the authorized sources.