NON-TITLE V PERMIT APPLICATION INSTRUCTIONS ASPHALT PLANT SOURCE DESCRIPTION FORM (APC 108)

This form should be used for all asphalt plants instead of the more general Process or Fuel Burning Source Description form (APC 102) and the Emission Point Description form (APC 101). This form should be completed for all new permit applications and all renewals where source conditions have changed since the previous application.

If any of the information requested is considered confidential, two application forms should be submitted, along with the Confidential Information Request form. One application form must be clearly marked to indicate that it contains confidential information, which is not to be made public and another application form, which does not contain the confidential information and can be placed in our general files. Emission data normally cannot be treated as confidential by the Division. Please contact the APC Division if there are any questions concerning confidentiality of information. The Confidential Information Request form can be found on the Division's website at: http://tn.gov/environment/article/permit-air-other-information.

The Tennessee Air Pollution Control Division prefers that application forms be submitted via email to the email address <u>Air.Pollution.Control@TN.gov</u>. All application forms should be scanned/combined into one PDF document and sent as an attachment to the email. If email is not available, then application forms can be mailed to the address on the form.

The items below give a brief explanation of the information being requested on the form. The following numbers refer to the specific box on the form:

- 1. The organization's legal name is the name under which the company is registered with the Tennessee Secretary of State (SOS). The organization's legal name and SOS control number can be found on the SOS website at https://tnbear.tn.gov/Ecommerce/FilingSearch.aspx. If the organization is not registered with the SOS, then the owner's name must be listed.
- **2.** The Emission Source Reference Number(s) will be assigned by the Tennessee Air Pollution Control Division. It is an eight digit number in the following format NN-NNN-NN.
- 3. Check "Yes" or "No" depending on whether the air contaminant source is subject to an NSPS rule (New Source Performance Standards) or NESHAP rule (National Emission Standard for Hazardous Air Pollutants). Depending on the year of manufacture, many asphalt plants are subject to 40 CFR Part 60, Subpart I. List the rule citation, including Part, Subpart, and applicable Sections. For example, an asphalt plant may be subject to 40 CFR Part 60 Subpart I and sections §60.90, §60.91, §60.92, and §60.93.
- 4. Indicate by checking the appropriate boxes whether or not construction of this plant commenced for the first time anywhere in Tennessee after April 3, 1972 and whether or not it commenced after April 21, 1976. Similarly, if this plant was moved into Tennessee from an out of state location, indicate whether or not the most recent move into Tennessee was after April 3, 1972 and whether or not it was after April 21, 1976.
- **5.** Enter the previous owner's name and most recent previous location of this plant along with the date it was moved from the site. Enter "not applicable" if the plant has not been moved from its original site. Enter the manufacture date of the asphalt plant.
- **6.** For the plant type, enter either batch or continuous. Enter either permanent or portable.
- **7.** For plant capacity, enter the approximate plant design and actual operating rates in tons per hour. Enter the estimated maximum and average annual production in tons per year. Enter the mixer design capacity in tons per batch, if appropriate.

- 8. Indicate, by completing the appropriate spaces, the type of road dust control for both plant roads and access roads. Indicate the approximate miles of paved and unpaved roads. If watering is used, also indicate the approximate frequency of watering. Access roads should include all private or public roads used to get from the plant property to a well maintained paved street or highway. Include only those portions of roads that are actually traveled. The unpaved category should include total miles of unpaved roads even if they are oiled or watered.
- **9.** Enter the approximate annual tonnage of material that is stockpiled. Indicate the number of sides enclosed for any stockpiles which have enclosures. Estimate the monthly turnover rate and indicate if the material is damp when received or if it is sprayed during receiving. If any other dust control method is used specify type and describe in detail under Comments, Item 15.
- **10.** Check either yes or no to the question pertaining to the exhaust of secondary sources of dust.
- 11. Enter operating parameters relating to stack emissions. Data for flow, velocity and moisture should be entered for both actual and standard conditions. Standard temperature is defined as 68°F for sources subject to New Source Performance Standards (NSPS), 60 °F for sources subject to diffusion equation based emission standards, and 70 °F for the rest of sources. Standard pressure is defined as 14.696 psia (1 atm). Dry conditions are defined as zero percent moisture. Enter the direction of the stack emissions (up, down, or horizontal). Enter the distance to the nearest property line (in feet).
- **12.** Emission estimates for each pollutant emitted from this source should be based on stack sampling results or engineering calculations. In certain cases, other estimates may be accepted. Calculations should be attached on a separate sheet. Full details regarding the calculation method and emission factors used should be included. For example:
 - (1) If U.S. EPA's Compilation of Air Emission Factors (AP-42) is used, submit the version, chapter, table, equation, etc. AP-42 can be found on the U.S. EPA's website: <u>https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors</u>.
 - (2) Attach sample calculations and fully explain any assumptions, bottlenecks, etc.
 - (3) Submit any supporting information such as manufacturer's data or safety data sheets (SDS).
 - (4) If the emissions are from a source test, provide details on the source test such as the date of the test, was the test approved by the Department, etc. If the source test was not approved by the Department, submit the test details and results.
 - (5) If multiple fuels are used, use the worst case fuel to calculate emissions for each pollutant, and list the fuel in the calculation method details. Include the percent sulfur in the fuel and the BTU content of fuel, when appropriate.

Average emissions (lbs./hr.) should be representative of the following: (1) For continuous or long-run, steady-state, operations it is the total weight of pollutant emitted to the atmosphere for the entire period of continuous operation or for a typical portion thereof divided by the number of hours of such period or portion thereof; (2) for cyclical or batch type operation, it is the total weight of the pollutant emitted to the atmosphere for a period which covers a complete or an integral number of cycles divided by the hours of actual process operation during such periods.

Maximum emissions (lbs./hr.) should be determined by dividing the total highest emissions possible during any 3 hour period with control equipment working properly, by 3. This will be dependent upon such things, either singly or in combination, as maximum possible operating rate, a particular input material, product, or fuel which may result in increased emissions; periods of highest emissions for cyclical or batch type operations, etc. Concentrations should be determined for stack emissions only and should reflect average exit gas concentrations reported in the units specified on the form.

Average emissions (ton/yr) should be calculated by multiplying the average emissions (lb/hr) by the normal operating hours (hr/yr) and converting the units from pounds (lb) to tons.

Potential emissions (ton/yr) or "Potential to emit" means the maximum capacity of a source to emit an air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit an air contaminant, including air contaminant control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design only if the limitation or the effect it would have on emissions is "legally enforceable." Secondary emissions do not count in determining the "potential to emit" of a source.

Emission estimation method code and control device descriptions, along with corresponding codes, can be found on the last page of these instructions. The codes which most accurately describe the estimation methods and control equipment should be used; along with the estimated control equipment efficiency for each pollutant present. Any estimation methods of control devices other than those listed in the tables should be described in the comments section.

Some hazardous air pollutants (HAPs) are considered both a HAP and an organic compound. Include these HAPs when determining organic compound totals. If necessary, additional HAPs can be listed in the Other (specify) areas or attached as an additional sheet.

- **13.** Include a description and the operating parameters of any control devices. Examples include bag house pressure drop, scrubber flow rate and pH of flow, temperature of thermal oxidizer, how often fabric filters are changed, etc. Typically this information can be found in the operating manual for the control device. If the control device is covered by a federal regulation, it is acceptable to cite the applicable section(s) of the federal regulation.
- **14.** Enter the approximate annual fuel usage along with the approximate usage per ton of asphalt produced. If units other than those specified are used, clearly indicate what units are being used to report fuel usage. Include both primary as well as any possible standby fuels so the source will have permitted authority to use such fuels. If the plant is capable of using standby fuel, but very little or none is ever used, indicate the usage per ton of asphalt for such fuel but enter negligible for annual usage.
- **15.** Use the comments space for further descriptions or other needed information that was not included previously or information on modifications.
- **16.** If this form is being submitted at the same time as an APC 100 form, then a signature is not required on this form. Date this form regardless of whether a signature is provided. If this form is NOT being submitted at the same time as an APC 100 form, then a signature is required. Applications should be signed by the responsible person listed in Item 7 of the APC 100 form.

Table of Pollution Control Device and Method Codes

Note: For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

Medium: 80-95%

High: 95-99+%.

And Low: Less than 80%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008, 010. If none of the below codes fit, use 999 as a code for other and specify in the comments.

No Equipment 000
Activated Carbon Adsorption
Afterburner – Direct Flame 021
Afterburner – Direct Flame with Heat Exchanger 022
Afterburner – Catalytic019
Afterburner – Catalytic with Heat Exchanger 020
Alkalized Alumina040
Cartridge Filter070
Catalytic Oxidation – Flue Gas Desulfurization 039
Cyclone – High Efficiency 007
Cyclone – Medium Efficiency
Cyclone – Low Efficiency 009
Dust Suppression by Chemical Stabilizers or
Wetting Agents
Electrostatic Precipitator – High Efficiency
Electrostatic Precipitator – Medium Efficiency 011
Electrostatic Precipitator – Low Efficiency
Fabric Filter – High Temperature
Fabric Filter – Medium Temperature
Fabric Filter – Low Temperature
Fabric Filter – Metal Screens (Cotton Gins)
Flaring

Gas Adsorption Column Packed050
Gas Adsorption Column – Tray Type051
Gas Scrubber (General: Not Classified)013
Limestone Injection – Dry041
Limestone Injection – Wet042
Liquid Filtration System049
Mist Eliminator – High Velocity014
Mist Eliminator – Low Velocity015
Process Enclosed054
Process Gas Recovery060
Settling Chamber – High Efficiency004
Settling Chamber – Medium Efficiency005
Settling Chamber – Low Efficiency006
Spray Tower (Gaseous Control Only)052
Sulfuric Acid Plant – Contact Process043
Sulfuric Acid Plant – Double Contact Process044
Vapor Recovery System (Including Condensers,
Hooding and Other Enclosures)047
Venturi Scrubber (Gaseous Control Only)053
Wet Scrubber – High Efficiency001
Wet Scrubber – Medium Efficiency002
Wet Scrubber – Low Efficiency003
Wet Suppression by Water Sprays061

Table of Emission Estimation Method Codes

Not applicable / Emissions are known to be zero	0
Emissions based on source testing	1
Emissions based on material balance using engineering expertise and knowledge of process	2
Emissions calculated using emission factors from EPA publications No. AP-42 Compilation of Air Pollution	
Emissions Factors	3
Judgment	4
Emissions calculated using a special emission factor different from that in AP-42	
Other (Specify in comments)	6
Judgment	4 5