

Catherine E. Heigel, Director Promoting and protecting the health of the public and the environment

July 2, 2015

Joe Reynolds PO Box 5227 Columbia, SC 29250

RE: Notice of Permit Coverage Associated Asphalt Columbia, LLC Permit Number: 9900-0025

Dear Mr. Reynolds:

Enclosed is the General Conditional Major Operating Permit for Asphalt Plants ("General Permit") for the above referenced facility. The federally enforceable emissions limitations and operational requirements contained within this General Permit are designed to restrict this facility's potential to emit to below major source thresholds. The permit was issued on July 15, 2013 and will be valid through June 30, 2018. Your facility's coverage under the terms and conditions of this permit begins on July 2, 2015.

Abbreviated periodic reports shall be completed and submitted in accordance with the previous permit's conditions and shall cover the interim period between the previous permit reporting period and the renewed permit reporting period. Reports required under the terms and conditions of the General Permit must be completed and submitted in a timely manner.

It is your responsibility to comply with all the requirements of this General Permit. The Department may conduct periodic inspections of your facility to determine compliance with the requirements of the General Permit. Any violations found during these inspections may result in an enforcement action. Therefore, it is incumbent upon you to ensure you are in compliance with the General Permit at all times.

It is important for you to read this issued permit carefully and to understand all requirements. If any errors or omissions are found, immediately notify Hetal Patel of my staff, via email at patelhy@dhec.sc.gov, or call (803) 898-3850.

Pursuant to the South Carolina Administrative Procedures Act, any Department decision involving the issuance, denial, renewal, suspension or revocation of a permit may be appealed by the applicant, permittee, licensee, and/or affected persons. Please see the enclosed "Guide to Board Review" for guidelines on filing an appeal.

Sincerely,

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Elizabeth J. Basil Director, Engineering Services Division Bureau of Air Quality

EJB:jsd:el Enclosure cc: Permit File: 9900-0025

ec: Ben Buchanan, BEHS

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APPLICABLE PERMIT DATES

COVERAGE DATE:

FACILITY PHYSICAL ADDRESS

FACILITY NAME: STREET ADDRESS: CITY, STATE, ZIP: COUNTY:

FACLITY NAME: STREET ADDRESS: CITY, STATE, ZIP: COUNTY: July 2, 2015

Associated Asphalt Columbia t/a Colprovia Asphalts 1119 Airport Boulevard Columbia, SC 29205 Richland

Associated Asphalt Columbia t/a Seaco Asphalt Emulsions 2700 William Tuller Drive Columbia, SC 29205 Richland

ASPHALT PLANT INFORMATION

| Equipment ID | Equipment Description | Installation / Modification Date | Control Device ID |
|-----------------|-------------------------------------|-------------------------------------|----------------------|
| AP | 130 TPH Drum Cold Mix Asphalt Plant | 1985 | SCRUB |
| DB | 27.1 million BTU/hr Dryer Burner | 1985 | SCRUB |
| B-1 | 2.06 million BTU/hr Boiler | 1984 | None |

FUEL FIRED SOURCES

| Equipment ID | Equipment Description | Fuels | Maximum Sulfur Content (%) |
|-----------------|----------------------------------|-------------------------------|-------------------------------|
| DB | 27.1 million BTU/hr Dryer Burner | Natural Gas No. 2 Fuel Oil | N/A 0.5 |
| B-1 | 2.06 million BTU/hr Boiler | No. 2 Fuel Oil | 0.5 |

CONTROL DEVICES

| Control Control Device Description | | Installation / Modification Date | Pollutants Controlled | |
|------------------------------------|------------------|----------------------------------|--|--|
| SCRUB | Venturi Scrubber | 1985 | PM, PM ₁₀ , PM _{2.5} | |

TANKS

| Tank ID | Tank Description | Capacity (Gallons) | Installation Date |
|---------|-------------------------------------|-----------------------|-------------------|
| AET-1 | Asphalt Emulsion Storage Tank No. 1 | 15,000 | 1975 |
| AET-2 | Asphalt Emulsion Storage Tank No. 2 | 8,000 | 1975 |
| AET-3 | Asphalt Emulsion Storage Tank No. 3 | 7,500 | 1975 |
| FOT-1 | No. 2 Fuel Oil Storage Tank | 10,000 | 2002 |

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OTHER EQUIPMENT - RESERVED

EXEMPT SOURCES - ASPHALT EMULSION PLANT BOILERS

| Equipment ID | Equipment Description Fuels | | Installation Date | Control Device ID |
|-----------------|-----------------------------|---|----------------------|----------------------|
| B-2 | 4.185 million BTU/hr Boiler | Natural Gas | Pre-2003 | None |
| В-3 | 4.185 million BTU/hr Boiler | Natural Gas No. 2 Fuel Oil (Max. Sulfur Content: 0.5%) | Pre-2003 | None |

EXEMPT SOURCES - PROCESSING TANKS FOR THE ASPHALT EMULSION PLANT

| Tank ID | Tank Description | Capacity (Gallons) | Odor Control Device Present? |
|---------|--------------------------------------|-----------------------|---------------------------------|
| А | Liquid Asphalt Cement Tank | 34,000 | Yes |
| В | Liquid Asphalt Cement Tank | 34,000 | Yes |
| С | Liquid Asphalt Cement Tank | 34,000 | Yes |
| D | Liquid Asphalt Cement Tank | 34,000 | Yes |
| Е | Liquid Asphalt Cement Tank | 34,000 | Yes |
| F | Liquid Asphalt Cement Tank | 34,000 | Yes |
| G | Liquid Asphalt Cement Tank | 34,000 | Yes |
| Н | Liquid Asphalt Cement Tank | 34,000 | Yes |
| Ι | Liquid Asphalt Cement Tank | 34,000 | Yes |
| J | Liquid Asphalt Cement Tank | 34,000 | Yes |
| K | Liquid Asphalt Cement Tank | 34,000 | Yes |
| L | Liquid Asphalt Cement Tank | 34,000 | Yes |
| М | Liquid Asphalt Cement Tank | 34,000 | Yes |
| 9 | Cationic Emulsion – CRS-2L / 2P Tank | 28,000 | No |
| 10 | Cationic Emulsion – CRS-2L / 2P Tank | 22,000 | No |
| 11 | Cationic Emulsion – CRS-2L / 2P Tank | 22,000 | No |
| 12 | Cationic Emulsion – CRS-2L / 2P Tank | 22,000 | No |
| 13 | Cationic Emulsion – CRS-1h Tank | 15,000 | No |
| 14 | Cationic Emulsion – CRS-1h Tank | 17,000 | No |
| 16 | Cationic Emulsion – CRS-1 Tank | 17,000 | No |
| 17 | Cationic Emulsion – CRS-2 Tank | 18,000 | No |
| 18 | Cationic Emulsion – CRS-2 Tank | 18,000 | No |
| 19 | Cationic Emulsion – CRS-1h Tank | 18,000 | No |
| 30 | Cationic Emulsion – CRS-1 Tank | 21,000 | No |
| 31 | Cationic Emulsion – CRS-1 Tank | 19,000 | No |
| 32 | Cationic Emulsion – CRS-2 Tank | 20,000 | No |
| 33 | Cationic Emulsion – CRS-2 Tank | 18,000 | No |
| 34 | Cationic Emulsion – CRS-2 Tank | 19,000 | No |
| 35 | Cationic Emulsion – CRS-2L / 2P Tank | 22,000 | No |
| 36 | Cationic Emulsion – CRS-2L / 2P Tank | 18,000 | No |
| 37 | Cationic Emulsion – CRS-1 Tank | 17,000 | No |
| 38 | Cationic Emulsion – CRS-1 Tank | 17,000 | No |
| 40 | Anionic Emulsion – HFRA Tank | 18,000 | No |

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EXEMPT SOURCES - PROCESSING TANKS FOR THE ASPHALT EMULSION PLANT

| Tank ID | Tank Description | Capacity (Gallons) | Odor Control Device Present? |
|---------------------|--|-----------------------|---------------------------------|
| 41 | Anionic Emulsion – RS-1 Tank | 12,000 | No |
| 43 | Anionic Emulsion – SS-1 / 1H Tank | 23,000 | No |
| 44 | Anionic Emulsion – EA-P / Special Tank | 22,000 | No |
| 45 | Anionic Emulsion – SEACO HPL Tank | 22,000 | No |
| 46 | Anionic Emulsion – AE-200 / HP Tank | 20,000 | No |
| 47 | Anionic Emulsion – RS-2 ¹ / ₂ – ¹ / ₂ Tank | 17,000 | No |
| 48 | Anionic Emulsion – HFMS-1 Tank | 22,000 | No |
| 49 | Anionic Emulsion – HFMS-1 Tank | 19,000 | No |
| Anionic Remill | Anionic Emulsion – HFRA Tank | 17,000 | No |
| Cationic Remill | Cationic Emulsion – CRS2 Tank | 14,000 | No |
| Fuel Oil #1 | Dyed Ultra LS #2 Tank | 20,000 | No |
| Fuel Oil #2 | Dyed Ultra LS #2 Tank | 20,000 | No |
| Boiler Fuel | Dyed Ultra LS #2 Tank | 5,200 | No |
| On Road Diesel | ULS Diesel Tank | 10,000 | No |
| Anti-Strip | AD-Here 260 Tank | 7,000 | No |
| Caustic Soda | 25% Sodium Hydroxide Tank | 6,500 | No |
| Tall Oil | MQB Tank | 25,000 | No |
| SBR Latex | SBR Latex Tank | 15,000 | No |
| Cationic Surfactant | AA-83 Tank | 15,000 | No |
| Cationic Surfactant | Tank | 8,200 | No |
| Hydrochloric Acid | Hydrochloric Acid Tank | 6,000 | No |
| Anionic Soap #1 | Anionic Soap Tank | 6,100 | No |
| Anionic Soap #2 | Anionic Soap Tank | 6,100 | No |
| Anionic Soap #3 | Anionic Soap Tank | 6,100 | No |
| Cationic Soap #1 | Cationic Soap | 6,100 | No |
| Cationic Soap #2 | Cationic Soap | 6,100 | No |
| Cationic Soap #3 | Cationic Soap | 6,100 | No |
| Cationic Soap #4 | Cationic Soap | Cationic Soap 6,100 | |

FACILITY SPECIFIC CONDITIONS

The facility must comply with the General Conditional Major Operating Permit for Asphalt Plants and any additional conditions listed in this section.

| Condition Number | Equipment ID | Conditions |
|---------------------|--------------|---|
| 1. | All | Associated Asphalt Columbia, LLC t/a Colprovia Asphalts (9900-0025) and Associated Asphalt Columbia, LLC t/a Seaco Asphalt Emulsions (1900-0220) are considered to be co- located. Combined emissions from both facilities shall be used to determine compliance with the facility wide emission limits established under the General Conditional Major Operating Permit for Asphalt Plants. |
| 2. | All | This facility is not subject to the requirements of 40 CFR 60, New Source Performance Standards (NSPS), Subpart A, General Conditions, and Subpart I, Standards of Performance For Asphalt Concrete Plants, and S.C. Regulation 61-62.60 Subparts A and Subpart I, Standards of Performance For Asphalt Concrete Plants. |
| 3. | B-1 | (S.C. Regulation 61-62.5, Standard No.1, Section I) This fuel burning source shall not |

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FACILITY SPECIFIC CONDITIONS

The facility must comply with the General Conditional Major Operating Permit for Asphalt Plants and any additional conditions listed in this section.

| Condition Number | Equipment ID | Conditions | | | | |
|---------------------|--------------|--|--|--|--|--|
| | | discharge into the ambient air smoke which exceeds an opacity of 20%. The opacity limit may be exceeded for sootblowing, but may not be exceeded for more than 6 minutes in a one hour period nor be exceeded for more than a total of 24 minutes in a 24 hour period. Emissions caused by sootblowing shall not exceed an opacity of 60%. | | | | |
| | | The opacity standards set forth above do not apply during startup or shutdown. The owner/operator shall, to the extent practicable, maintain and operate any source including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. The owner/operator shall maintain a log of the time, magnitude, duration, and any other pertinent information to determine periods of startup and shutdown and make these records available to a Department representative upon request. | | | | |
| 4. | All | (S.C. Regulation 61-62.5, Standard No. 4, Section VIII) Particulate matter emissions shall be limited to the rate specified by use of the following equations: For process weight rates less than or equal to 30 tons per hour $E = (F) 4.10P^{0.67}$ and | | | | |
| 5. | SCRUB | The owner/operator shall continue to operate and maintain a pressure drop indicator on each scrubber module. The pressure drop shall be recorded daily during source operation. Operation and maintenance checks shall be made on at least a weekly basis. The scrubber shall be in place and operational whenever processes controlled by it are running, except during periods of scrubber malfunction or mechanical failure. An operational range for the pressure drop has been established to ensure proper operation. This operational range for the pressure drop was derived from stack test data, vendor certification, and/or operational history and visual inspections, which demonstrate the proper operation of the equipment. The facility shall maintain the established ranges and supporting documentation for this monitored parameter. Operating ranges may be updated following submittal to the Director of Engineering Services. All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and | | | | |

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FACILITY SPECIFIC CONDITIONS

The facility must comply with the General Conditional Major Operating Permit for Asphalt Plants and any additional conditions listed in this section.

| Condition Number | Equipment ID | Conditions |
|---------------------|--------------|---|
| | | corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such. |
| | | Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.1 Section II. |

| | RECORD OF REVISIONS | | | | | |
|----------------------|----------------------------------|--|--|--|--|--|
| Revision Date | ision Date Description of Change | | | | | |
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ATTACHMENT - EMISSION RATES FOR AMBIENT AIR STANDARDS

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The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see Ambient Air Standards Requirements).

| AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2 | | | | | | | |
|--|-------------------------|-------------------|-----------------|-----------------|-------|----------|----|
| Emission Point ID | Emission Rates (lbs/hr) | | | | | | |
| Emission Point ID | PM_{10} | PM _{2.5} | SO ₂ | NO _x | СО | Lead | HF |
| Boiler | 0.04 | 0.03 | 0.11 | 0.29 | 0.07 | 2.00E-05 | |
| Scrubber | 3.36 | | 1.43 | 7.15 | 17.22 | | |
| SRC1 – Boiler No. 1 | 0.03 | 0.03 | 0.003 | 0.41 | 0.34 | 2.10E-06 | |
| SRC1 – Boiler No. 2 | 0.07 | 0.06 | 0.21 | 0.60 | 0.34 | 3.80E-05 | |

| TOXIC AIR POLLUTANTS - STANDARD NO. 8 | | | | | | | |
|---------------------------------------|-------------------------|----------------------|---------------------|-------------------------|------|--|--|
| | Emission Rates (lbs/hr) | | | | | | |
| Emission Point ID | Formaldehyde 50-00-0 | Mercury 7439-97-6 | Nickel 7440-02-0 | Phosphorus 7723-14-0 | РОМ | | |
| Scrubber | 0.42 | 3.40E-04 | 8.22E-03 | 3.65E-03 | 0.12 | | |

| TOXIC AIR POLLUTANTS - STANDARD NO. 8 | | | | |
|---------------------------------------|-----------|---|--|--|
| Pollutant | CAS # | Facility Wide Emission Rates (lbs/day) | | |
| Antimony Compounds | N/A | 0.001 | | |
| Arsenic | 7440-38-2 | 0.002 | | |
| Benzene | 71-43-2 | 1.236 | | |
| Cadmium | 7440-43-9 | 0.001 | | |
| Carbon Disulfide | 75-15-0 | 0.008 | | |
| Chromium(+6) Compounds | N/A | 0.001 | | |
| Cobalt Compounds | N/A | 0.000 | | |
| Cumene | 98-82-8 | 0.014 | | |
| Ethyl Benzene | 100-41-4 | 0.800 | | |
| Ethyl Chloride | 75-00-3 | 0.002 | | |
| Hexane | 110-54-3 | 2.928 | | |
| Hydrogen Sulfide | 7783-06-4 | 0.170 | | |
| Manganese Compounds | N/A | 0.024 | | |
| Methyl Bromide | 74-83-9 | 0.003 | | |
| Methyl Chloride | 74-87-3 | 0.011 | | |
| Methyl Chloroform | 71-55-6 | 0.150 | | |
| Methyl Ethyl Ketone | 78-93-3 | 0.021 | | |
| Methylene Chloride | 75-09-2 | 0.000 | | |
| Naphthalene | 91-20-3 | 2.056 | | |
| Perchloroethylene | 127-18-4 | 0.001 | | |
| Phenol | 108-95-2 | 0.013 | | |
| Selenium Compounds | N/A | 0.001 | | |
| Sodium Hydroxide | 1310-73-2 | 0.144 | | |
| Styrene | 100-42-5 | 0.003 | | |
| Tetrachlorinated Dibenzo-p-dioxins | 1746-01-6 | 0.000 | | |
| Toluene | 108-88-3 | 9.099 | | |

ATTACHMENT - EMISSION RATES FOR AMBIENT AIR STANDARDS

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| TOXIC AIR POLLUTANTS - STANDARD NO. 8 | | | | | |
|---------------------------------------|-----------|---|--|--|--|
| Pollutant | CAS # | Facility Wide Emission Rates (lbs/day) | | | |
| 2,2,4-Trimethylpentane | 540-84-1 | 0.125 | | | |
| Xylene | 1330-20-7 | 0.753 | | | |
| o-Xylene | 95-47-6 | 0.032 | | | |