

# ALLEGHENY COUNTY HEALTH DEPARTMENT AIR QUALITY PROGRAM

May 22, 2024

**SUBJECT:** **Lindy Paving, Inc.**  
2340 Second Ave.  
Pittsburgh, PA 15219  
Allegheny County

## **Synthetic Minor Source Operating Permit No. 0214-OP24**

**TO:** JoAnn Truchan, P.E.  
Program Manager, Engineering

**FROM:** Mary Gleason, P.E.  
Air Quality Engineer

### **FACILITY DESCRIPTION:**

Lindy Paving, Inc. Second Ave. facility produces hot mix asphalt (HMA) in a counter-flow drum mix asphalt plant. The mixer is supplied with a 200 MMBtu/hr low NO<sub>x</sub> burner and the particulate emissions are controlled by a baghouse with an outlet grain loading of 0.01 grains/dscf for filterable particulate. “Blue smoke” controls are in place at the mixer outlet, conveyor to the storage silos, the conveyor on top of the silos, and the silo exhausts. Fugitive dust controls consisting of three-sided enclosures and aggregate moisture content monitoring are in place for controls of particulates from aggregate handling. Foundry sand is not used at this facility.

The plant has a maximum potential production capacity of 600 tons of hot mix asphalt per hour. Production is limited to 1,000,000 tons for any consecutive twelve-month period.

The facility is a synthetic minor source of carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and volatile organic compounds (VOCs), and a minor source of particulate matter (PM), particulate matter < 10 microns in diameter (PM<sub>10</sub>), particulate matter < 2.5 microns in diameter (PM<sub>2.5</sub>), sulfur oxides (SO<sub>x</sub>), and hazardous air pollutants (HAPs) as defined in section 2101.20 of Article XXI. The facility is a minor source of greenhouse gas emissions (CO<sub>2e</sub>) as defined in the U.S. EPA Greenhouse Gas Tailoring Rule.

### **OPERATING PERMIT DESCRIPTION**

This is a synthetic minor source operating permit renewal for Lindy Paving, Inc. Second Avenue, Pittsburgh facility. The previous synthetic minor operating permit was issued on August 26, 2014. The renewal permit will incorporate the conditions of Amended Installation Permit #0214-I002b, issued concurrently with this operating permit. The renewal permit will include the following updates, all of which are documented in Amended Installation Permit #0214-I002b, specifically:

- the facility is a synthetic minor source for nitrogen oxides (NO<sub>x</sub>) – it was for IP#0214-I002a as well but it was not stated there
- the change in the maximum allowable annual production to 1,000,000 tons product per year;
- the addition of a third heated 30,000-gallon asphalt storage tank that was added after the amendment of the installation permit (#0214-I002a, amendment issued May 27, 2013) and was recorded in Operating

- Permit #0214 issued August 26, 2014;
- the removal of two 280-ton each product silos that were replaced with three 300-ton each product silos in December of 2015;
- the correction to the diesel storage tank capacity (2,000 gallons);
- the removal of the emissions limit for formaldehyde and the stack testing requirement for formaldehyde for this Lindy Paving, Inc. facility;
- use of adjustment factor (15%) in calculations where emissions factors from US EPA AP-42 were used.
- update to responsible official and facility contacts.
- Replacement of erroneous terms (bituminous concrete, asphalt concrete) throughout permit with hot mix asphalt

**PERMIT APPLICATION COMPONENTS:**

1. Synthetic Minor Operating Permit #0214, issued August 26, 2014
2. Renewal Operating Permit Application #0214, dated March 8, 2019
3. Installation Permit #0214-I001, issued April 30, 1999 (2 liquid asphalt storage tanks)
4. Installation Permit #0214-I002, issued May 10, 2007 (existing HMA plant)
5. Installation Permit #0214-I002a amendment issued May 27, 2013 (NO<sub>x</sub> limits)
6. Installation Permit #0214-I002b amendment issued --
7. Stack test reports, dated September 5, 2007; November 20, 2012; October 9, 2017; and November 17, 2022 (PM, NO<sub>x</sub>, CO, etc.)
8. November 2, 2007, and November 20, 2012 (included formaldehyde)
9. Correspondence from facility, dated March 20, 2023 (correction of product terminology, request to remove limitation on operating hours per year)

**PRE-1996 PERMITS:**

Permit #0018008-000-76002: issued July 19, 1994, to Trumbull Corporation (former owner) to use foundry sand, which is no longer allowed to be used at the facility.

**EMISSION SOURCES:**

**Emissions Sources**

<b>ID.</b>	<b>Source Description</b>	<b>Control Device(s)</b>	<b>Maximum Capacity</b>	<b>Fuel/Raw Material</b>	<b>Stack I.D.</b>
P001	Hot Mix Asphalt Plant Installed 2007	Dryer Baghouse and Blue Smoke Capture System	600 tons asphalt/hr	Natural Gas	S001
P002 <sup>1</sup>	3 – Heated Aboveground Liquid Asphalt Cement Storage Tanks, with single Natural Gas-fired heater Installed in 2000, 2010	None	Tanks:30,000 gallons each Heater: 1.0 MMBtu/hr	Natural Gas	S002
P003 <sup>2</sup>	6 – Hot Mix Asphalt Product Storage Silos Installed 2007 and 2015	None	300 tons each	NA	NA
P004 <sup>3</sup>	9 – Aggregate Storage Piles	Fugitive Dust Suppression & Pile Enclosures	500 tons to 19,000 tons	Natural sand, manufactured sand, limestone	NA
	1 – Recycled Asphalt Pavement Pile	None	70,000 tons	NA	NA

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
D001	Diesel Fuel (Surface) Storage Tank Installed prior to ~2013	None	2,000 gallons	Diesel Fuel	NA

<sup>1</sup> Synthetic Operating Permit #0214 issued August 26, 2014, documented the addition of one heated above ground asphalt storage tank.

<sup>2</sup> Two 280-ton storage silos were replaced by three 300-ton silos in December 2015.

<sup>3</sup> Number of piles and their sizes can vary over time depending on product demand.

**METHOD OF DEMONSTRATING COMPLIANCE:**

Compliance with the emission standards set forth in this permit will be demonstrated by the specified emission testing as detailed in the permit. Continuing compliance with the standards of this permit will be the monitoring of the dryer baghouse differential pressure drop to ensure proper operation, the monitoring of the aggregate moisture content and fines content as well as aggregate handling work practices, the use of the blue smoke capture and control system, weekly inspections of aggregate storage, aggregate handling equipment, and enclosed portions of the plant controlled by the blue smoke technology, along with record keeping and reporting requirements. See Synthetic Minor Source Operating Permit #0214-OP24 for the specific conditions for determining compliance with the applicable requirements.

**EMISSION CALCULATIONS**

Note that all emissions calculations are identical to those stated in Installation Permit #0214-I002b, amended concurrently with this operating permit issuance. Sample calculations are documented there.

**Hot Mix Asphalt Plant**

The hot mix asphalt plant creates emissions prior to the dryer/mixer. Emissions factors for this part of the plant were provided by the facility (see application for Installation Permit #0214-I002 dated October 31, 2006, via a reference entitled “National Asphalt Pavement Association, Special Report 175). All PM<sub>2.5</sub> emissions were assumed to equal PM<sub>10</sub> emissions. The maximum hourly production rate was 600 tons product/hour; annual emissions were based on production limited to 1,000,000 tons product per year. The facility is also limited to 2,500 operating hours annually.

**Pre-Dryer/Mixer Aggregate Handling Emissions**

Pollutant	Emissions Factor lb pollutant/ton hot mix asphalt	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
PM	$2.84 \times 10^{-4}$	National Asphalt Pavement Association, Special Report 175 Basis 1,000,000 tons product/year	0.170	0.142
PM <sub>10</sub>	$5.40 \times 10^{-5}$	National Asphalt Pavement Association, Special Report 175 Basis 1,000,000 tons product/year	0.032	0.027
PM <sub>2.5</sub>		Assume PM <sub>2.5</sub> = PM <sub>10</sub> Basis 1,000,000 tons product/year	0.032	0.027

\*A year is defined as any consecutive 12-month period

**Drum Dryer/Mixer Baghouse:**

The particulate emissions from the drum dryer are controlled by a baghouse. Filterable PM emissions from the baghouse are based on the outlet loadings from stack test reports dated September 5, 2007; November 20, 2012; October 9, 2017; and November 17, 2022. The outlet loading used in the potential to emit calculations is the result of taking the maximum outlet grain loading reported for the filterable PM, normalizing it to full capacity run conditions, and then multiplying the result by a 15% uncertainty factor to account for process variability. This resulted in an actual outlet grain loading of 0.004 gr/dscf which is lower than the 0.01 gr/dscf used in Installation permit #0214-I002a, which resulted in an unreasonably high calculated PTE. This methodology results in an emissions estimate more representative of actual operating conditions at the facility. The potential filterable PM emissions were then calculated by a mass balance. Filterable PM<sub>10</sub> and PM<sub>2.5</sub> emissions are based on particulate fractions listed in US EPA AP-42 Chapter 11 Table 11.1-4 (March 2004). Note that Installation Permit #0214-I002a used the wrong particle fraction for PM<sub>2.5</sub>; that has been corrected here.

Condensable particulate matter emissions were calculated using the outlet loadings for condensable particulate from the baghouse stack test reports dated September 5, 2007; November 20, 2012; October 9, 2017; and November 17, 2022. The outlet loading used in the calculations is the result of taking the maximum outlet grain loading for the condensable PM, normalizing it to full capacity run conditions, and then multiplying the result times an uncertainty factor to account for process variability. This resulted in an outlet grain loading of 0.006 gr/dscf, from which potential condensable PM emissions were then calculated by a mass balance. This provides an emissions limit more representative of actual operating conditions at the facility than from using emissions factors from US EPA AP-42 Table 11.1-3 as in Installation Permit #0214-I002a. All condensable PM is assumed to equal PM<sub>10</sub> and PM<sub>2.5</sub>.

**Drum Dryer/ Mixer Baghouse Particulate Emissions**

Pollutant	Emissions Factor	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
PM filterable	0.004 gr/dscf from stack test	Mass balance; Basis 8760 hrs/yr	2.30	10.09
PM condensable	0.006 gr/dscf from stack test	Mass balance Basis 8760 hrs/yr	3.46	15.14
Total PM		Sum of filterable + condensable	5.76	25.23
PM <sub>10</sub> filterable	30% of PM	US EPA AP-42 Table 11.1-4 (Mar. 2004) Basis 8760 hrs/yr	0.069	3.03
PM <sub>10</sub> condensable	PM=PM <sub>10</sub> =PM <sub>2.5</sub>		3.46	15.14
Total PM <sub>10</sub>		Sum of filterable + condensable	4.15	18.16
PM <sub>2.5</sub> filterable	21% of PM	US EPA AP-42 Table 11.1-4 (Mar. 2004) basis 8760 hrs/yr	0.48	2.12
PM <sub>2.5</sub> condensable	PM=PM <sub>10</sub> =PM <sub>2.5</sub>		3.46	15.14
Total PM <sub>2.5</sub>		Sum of filterable + condensable	3.94	17.26

\*A year is defined as any consecutive 12-month period

The other criteria pollutant potentials to emit were determined using emissions factors from US EPA AP-42, Chapter 11, with the exception of NO<sub>x</sub>. The NO<sub>x</sub> emissions factor referenced here is from Installation Permit

#0214-I002a, which had consulted the RACT/BACT/LAER Clearinghouse to find a more applicable emissions factor than that from AP-42. Calculations which used emissions factors from AP-42 also used a 15% adjustment factor to account for variability.

**Drum Dryer/ Mixer Baghouse Criteria Pollutant Emissions**

Pollutant	Emissions Factor lb pollutant/ton hot mix asphalt	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
NO <sub>x</sub>	0.045	Installation Permit #0214-I002a Basis: 1,000,000 tons product	27.00	22.50
CO	0.13	AP-42 Table 11.1-7 (Mar. 2004) Basis: 1,000,000 tons product	89.70	74.75
SO <sub>2</sub>	0.0034	AP-42 Table 11.1-7 (Mar. 2004) Basis: 1,000,000 tons product	2.346	1.955
VOC	0.032	AP-42 Table 11.1-8 (Mar. 2004) Basis: 1,000,000 tons product	22.080	18.400
Formaldehyde	0.0031	AP-42 Table 11.1-10 (Mar. 2004) Basis: 1,000,000 tons product	2.139	1.783
Total HAPs	0.0055	AP-42 Table 11.1-10, 11.1-11 (Mar. 2004)	3.795	3.163

\*A year is defined as any consecutive 12-month period

**Liquid Asphalt Cement Storage Tanks**

The facility operates three 30,000 gallon (each) heated asphalt storage tanks. Emissions factors for the heated asphalt storage tanks are based on the document EPA Hot Mix Asphalt Plants Emission Assessment Report, EPA 454/R-00-019, Table 11 (December 2000). Note that the emissions factors below included an oil-fired heater; however, the heater for Lindy Paving is natural gas-fired, and its emissions are calculated separately. See Liquid Asphalt Heater Calculations. The maximum hourly production rate was 600 tons product/hour; production was limited to 1,000,000 tons product per year.

**Heated Asphalt Storage Tank Emissions**

Pollutant	Emissions Factor lb/ton	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
CO	$3.0 \times 10^{-5}$	EPA 454/R-00-019, Table 11 Basis 1,000,000 tons product/year	0.018	0.015
VOC	$3.02 \times 10^{-4}$	EPA 454/R-00-019, Table 11 Basis 1,000,000 tons product/year	0.181	0.151

\*A year is defined as any consecutive 12-month period

**Natural gas-fired heater for the liquid asphalt cement storage tanks:**

The liquid asphalt heater is natural gas-fired with a maximum capacity of 1.0 MMBtu/hr. Its maximum potential emissions are based on 8,760 hours per year of operation. Emissions factors for PM are from Article XXI §2104.02. All other emissions factors are from on US EPA AP-42 Chapter 1.4 Tables 1.4-1,2,3,4 (July 1998). A

15% adjustment factor was used to account for variability for the pollutants using emissions factors from AP-42. It was assumed that all PM equals PM<sub>10</sub> and equals PM<sub>2.5</sub>.

**Liquid Asphalt Heater Emissions**

Pollutant	Emissions Factor	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
PM	0.008 lb / MMBtu	Article XXI sec 2104.02 Basis 8,760 hours	0.008	0.035
PM <sub>10</sub>	0.0008 lb / MMBtu	Assume PM <sub>10</sub> = PM	0.008	0.035
PM <sub>2.5</sub>	0.008 lb / MMBtu	Assume PM <sub>2.5</sub> = PM	0.008	0.035
SO <sub>x</sub>	0.6 lb/MMscf	AP-42 Ch 1.4 Table 1.4-2 Basis 8,760 hours	0.0007	0.003
NO <sub>x</sub>	100 lb/MMscf	AP-42 Ch 1.4 Table 1.4-1; assumed uncontrolled Basis 8,760 hours	0.110	0.480
VOC	5.5 lb/MMscf	AP-42 Ch 1.4 Table 1.4-2 Basis 8,760 hours	0.006	0.026
CO	84 lb/MMscf	AP-42 Ch 1.4 Table 1.4-1 Basis 8,760 hours	0.092	0.403
Formaldehyde	0.075 lb/MMscf	AP-42 Ch 1.4 Table 1.4-3 Basis 8,760 hours	0.00008	0.0004
HAPs	1.90 lb/MMscf	AP-42 Ch 1.4 Table 1.4-3 Basis 8,760 hours	0.002	0.009

\*A year is defined as any consecutive 12-month period

**Hot Mix Asphalt Product Silo Filling**

For product silo filling, maximum potential emissions are based on a maximum hourly production rate of 600 tons product/hour and maximum production per year is limited to 1,000,000 tons product. Emissions factors for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>, CO, and VOC are based on US EPA AP-42 Chapter 11 Table 1.1-14 (April 2004). It is assumed that the asphalt volatility (V) equals (-0.5), and the hot mix temperature (T) equals 325 degrees Fahrenheit in the calculation for the emissions factors. A 15% adjustment factor was used to account for variability for the pollutants using emissions factors from AP-42. It was assumed that all PM equals PM<sub>10</sub> and equals PM<sub>2.5</sub>.

**Product Silo Filling Emissions**

Pollutant	Emissions Factor (lb / ton product)	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
PM	$5.86 \times 10^{-4}$	AP-42 Ch 11 Table 11.1-14 Basis: 1,000,000 tons / yr	0.404	0.337
PM <sub>10</sub>		Assume PM <sub>10</sub> = PM	0.404	0.337
PM <sub>2.5</sub>		Assume PM <sub>2.5</sub> = PM	0.404	0.337
VOC	$1.22 \times 10^{-2}$	AP-42 Ch 11 Table 11.1-14 Basis: 1,000,000 tons / yr	8.418	7.015
CO	$1.18 \times 10^{-3}$	AP-42 Ch 11 Table 11.1-14 Basis: 1,000,000 tons / yr	0.814	0.679

\*A year is defined as any consecutive 12-month period

**Plant Product Loadout:**

For plant loadout emissions, maximum potential emissions are based on a maximum hourly production rate of 600 tons product/hour and maximum production per year is limited to 1,000,000 tons. Emissions factors for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>, CO, and VOC are based on US EPA AP-42 Chapter 11 Table 11.1-14 (April 2004). It is assumed that asphalt volatility (V) equals (-0.5), and the hot mix temperature (T) equals 325 degrees Fahrenheit in the calculation for the emissions factors. A 15% adjustment factor was used to account for variability for the pollutants using emissions factors from AP-42. It was assumed that all PM equals PM<sub>10</sub> and equals PM<sub>2.5</sub>.

**Plant Loadout Emissions**

Pollutant	Emissions Factor (lb pollutant / ton product)	Reference	Short-Term Emissions (lb/hr)	Long-Term Emissions (ton/yr)*
PM	$5.22 \times 10^{-4}$	AP-42 Ch 11 Table 11.1-14 Basis 1,000,000 tons/yr	0.360	0.300
PM <sub>10</sub>		Assume PM <sub>10</sub> = PM	0.360	0.300
PM <sub>2.5</sub>		Assume PM <sub>2.5</sub> = PM	0.360	0.300
VOC	$4.13 \times 10^{-3}$	AP-42 Ch 11 Table 11.1-14 Basis 1,000,000 tons/yr	2.850	2.375
CO	$1.35 \times 10^{-3}$	AP-42 Ch 11 Table 11.1-14 Basis 1,000,000 tons/yr	0.932	0.776

\*A year is defined as any consecutive 12-month period

**GHG Mass and CO<sub>2</sub>e Emissions:**

GHG estimated emissions from the hot mix asphalt dryer and the liquid asphalt heater are included here for informational purposes only.

Calculations of greenhouse gases (GHG) and CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) emissions are based on the methodology found in 40 CFR Part 98, Subpart C, §98.33(a)(1), and factors found in Table C-1 and Table C-2 of that subpart.

Rated heat input capacity for the liquid asphalt heater = 1 MMBtu/hr × 8,760 hr/yr = 8,760 MMBtu/yr

Emission Factors:

	Natural Gas
CO <sub>2</sub>	53.02 kg/MMBtu
N <sub>2</sub> O	0.0001 kg/MMBtu
CH <sub>4</sub>	0.001 kg/MMBtu

CO<sub>2</sub>: 8,760 MMBtu/yr × 53.02 kg/MMBtu ÷ 1,000 kg/metric ton = 464.5 metric tons/year

NO<sub>2</sub>: 8,760 MMBtu/yr × 1×10<sup>-4</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.0009 metric tons/year

CH<sub>4</sub>: 8,760 MMBtu/yr × 1×10<sup>-3</sup> kg/MMBtu ÷ 1,000 kg/metric ton = 0.009 metric tons/year

Global Warming Potential (GWP) Factors (from Part 98, Subpart A, Table A-1):

CO<sub>2</sub> = 1

N<sub>2</sub>O = 298

CH<sub>4</sub> = 25

$$\text{CO}_2\text{e} = (464.5 \times 1) + (0.0009 \times 298) + (0.009 \times 25) = 464.9 \text{ metric tons/year of CO}_2\text{e} \\ = 512.5 \text{ tpy CO}_2\text{e from the liquid asphalt heater}$$

For the drum dryer/mixer in the hot mix asphalt plant:

CO<sub>2</sub> emissions factor from AP-42 Table 11.1-7: 33 lb/ton

CH<sub>4</sub> emissions factor from AP-42 Table 11.1-8: 0.012 lb/ton

No emissions factor available for N<sub>2</sub>O.

Basis: 1,000,000 tons of product/year

CO<sub>2</sub>:

$$= 33 \text{ lb CO}_2\text{/ton product} \times 1,000,000 \text{ tons product/year} \times 1 \text{ ton}/2,000 \text{ lb}$$

$$= 16,500 \text{ tons CO}_2\text{/yr from the Hot Mix Asphalt Plant}$$

CH<sub>4</sub>

$$= 0.012 \text{ lb CH}_4\text{/ton product} \times 1,000,000 \text{ tons product/yr} \times 1 \text{ ton}/2,000 \text{ lb}$$

$$= 6.9 \text{ tons CH}_4\text{/tons year}$$

CO<sub>2</sub>e:

$$\text{CO}_2\text{e} = (16,500 \times 1) + (6.9 \times 298) = 18,856 \text{ tons/year of CO}_2\text{e from the dryer/mixer}$$

**Total GHG:**

$$= 512.5 \text{ tpy} + 18,856 \text{ tpy} = \mathbf{19,368.5 \text{ tpy CO}_2\text{e}}$$

## **REGULATORY APPLICABILITY:**

### **1. Article XXI Requirements for Issuance:**

See Operating Permit Application No. 0214 dated March 8, 2019 Section 5: Applicable Requirements. The requirements of Article XXI, Parts B and C for the issuance of minor modification installation permits have been met for this facility. Article XXI, Part D, Part E & Part H will have the necessary sections addressed individually.

### **2. Testing Requirements:**

The permittee shall conduct testing of the facility for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and VOCs at least once every 5 years. The Department reserves the right to require additional testing if necessary in the future to assure compliance with the terms and conditions of this Synthetic Minor Source Operating Permit.

### **3. New Source Performance Standards (NSPS):**

#### **40 CFR 60 Subpart I, Standards of performance for Hot Mix Asphalt Facilities:**

The facility is subject to this regulation which requires that there be no discharge into the atmosphere from the facility from any exhaust which contains particulate matter in excess of 90 mg/dscm (0.04 gr/dscf) or exhibits 20 percent opacity, or greater.

#### **40 CFR 60 Subpart OOO, Standards of Performance for Non-Metallic Mineral Processing Plants:**

The facility is not subject to this regulation. Sec 60.670 of Subpart OOO states that "...crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage facility. There is one 200 ton/hr RAP crusher located after the first storage bin.

**40 CFR 60, Subpart Kb for Volatile Organic Liquid Storage Vessels:** This rule does not apply for D001 because the capacity the tank is less than 75 cubic feet (19, 813 gallons) and the tank stores diesel fuel which has low volatility.



4. **NESHAP and MACT Standards:**

This source is a minor source of hazardous air pollutants, as defined in 40 CFR §63.2 and Article XXI, §2101.20. There are no area source rules that apply to the facilities at this source.

5. **Emissions Inventory:**

This facility is required to provide annual Emission Inventory reports per §2108.01.e of Article XXI because this facility has the potential to emit more than 25 tpy of CO and VOCs.

6. **Risk Management Plan; CAA Section 112(r):**

The facility is not required to have a risk management plan at this time because none of the regulated chemicals exceed the thresholds in the regulation.

7. **Greenhouse Gas Reporting (40 CFR Part 98):**

Lindy Paving, Inc. Second Avenue facility is not a major source of greenhouse gases. Should the facility exceed 25,000 metric tons of CO<sub>2</sub>e in any 12-month period, the facility would have to submit reports in accordance with 40 CFR Part 98.

8. **Environmental Justice**

According to the PA DEP's Penn Enviro Screen, the facility is not located in an environmental justice community but the area directly west and northwest are EJ areas. Because this is an existing facility, alternative site location is not feasible. The operating permit contains all testing, monitoring, recordkeeping, and reporting requirements. EJ areas are defined by the Pennsylvania DEP as "any census tract where 20 percent or more individuals live at or below the federal poverty line, and/or 30 percent or more of the population identifies as a non-white minority, based on data from the U.S. Census Bureau and the federal guidelines for poverty". Because this is an existing facility, alternative site location is not feasible. The operating permit contains all testing, monitoring, recordkeeping, and reporting requirements.

**EMISSIONS SUMMARY:**

**Emissions Summary for Lindy Paving, Inc. Second Avenue Facility**

<b>Pollutant</b>	<b>Total (tpy)*</b>
Particulate Matter	26.04
Particulate Matter <10 µm (PM <sub>10</sub> )	18.86
Particulate Matter <2.5 µm (PM <sub>2.5</sub> )	17.96
Nitrogen Oxides (NO <sub>x</sub> )	22.98
Sulfur Oxides (SO <sub>x</sub> )	1.96
Carbon Monoxide (CO)	76.62
Volatile Organic Compounds (VOC)	27.97
Hazardous Air Pollutants (HAP)	3.17
Greenhouse Gases (CO <sub>2</sub> e)	19,368.5

\* A year is defined as any consecutive 12-month period.

**RECOMMENDATION:**

All applicable Federal, State, and County regulations have been addressed in the permit application. The Operating Permit for the Lindy Paving, Inc. Second Avenue facility should be approved with the emission limitations, terms and conditions in Synthetic Minor Source Operating Permit No. 0214-OP24.