



September 12, 2025

Katherine Coffin
Deputy Regional Permit Administrator
Division of Environmental Permits, Region 3
New York State Department of Environmental Conservation
21 South Putt Corners Road
New Paltz, New York 12561-1620

Submitted VIA EMAIL
Katherine.Coffin@dec.ny.gov

RE: Response to NYSDEC Request for Additional Information
RCA Asphalt, LLC – Mount Vernon Plant
Air State Facility Permit Renewal
DEC Facility: 3-5508-00133/00005
City of Mount Vernon, Westchester County

Dear Ms. Coffin:

JMT of New York, Inc. (JMT), on behalf of RCA Asphalt, LLC (RCA), respectfully submits this response to address the New York State Department of Environmental Conservation (NYSDEC or Department) Request for Additional Information (RFAI), dated August 15, 2025.

It is recognized that numerous NYSDEC staff have worked on the Department's protracted review of RCA's Air State Facility (ASF) Permit renewal. Therefore, to ensure common understanding with the Department and to provide context for RCA's position on the status of the renewal and the requirements for completeness, the following summary of the renewal process to date is provided. RCA's response to the Departments RFAI is provided after the summary.

SUMMARY

RCA currently holds an ASF Permit that authorizes emissions related to the production of Asphaltic Concrete. The ASF Permit includes conditions that limit facility-wide emissions below major source thresholds. Specifically, Oxides of Nitrogen (NOx) and Carbon Monoxide (CO) are capped at 23.45 tons per year (TPY) and 95 TPY, respectively. Limiting these compounds below major source thresholds effectively caps emissions of all other Criteria Pollutants below major source thresholds. The Permit includes no expiration date and was originally issued in 2007.

After issuance of the ASF Permit, NYSDEC regulations were updated to include a provision allowing the Department to initiate renewal of existing permits that do not have expiration dates. On May 11, 2023, NYSDEC issued a notice, requiring that RCA submit an ASF permit renewal within ninety (90) days. RCA complied and submitted a timely renewal on August 8, 2023. In accordance with the Uniform Procedures Act, the Department's determination on completeness was due on August 24, 2023. The Department failed to adhere to this statutory requirement.

On June 4, 2024, a separate notice was received requesting renewal of the Air Facility Registration (AFR) for NY Materials, LLC (NY Materials), a facility with common ownership with RCA. Like RCA's ASF Permit, NY Materials' AFR had no expiration date, and was issued in 2007. NY Materials' AFR authorizes the use of a screening unit (Chieftain 1700) used in the processing of milled asphalt to produce reclaimed asphalt products (RAP) and is powered by an exempt onboard diesel fired engine. As was disclosed to the Division of Air Resources (DAR) in June 2024, NY Materials and RCA have common ownership, however, NYSDEC nevertheless issued separate authorizations in 2007.

Based on questions asked by DAR regarding the matter, JMT speculates that this may have been due to confusion over whether authorizations could extend across property boundaries. Nonetheless, the Chieftain 1700 authorized by NY Materials is used to support the RCA Asphalt Plant operations. Specifically, the Chieftain 1700 is used to produce a sized product known as “RAP Stone”, which is used in the production of GreenPatch, a cold mix asphalt technology. In consideration of this, and in the spirit of collaboration with DAR to achieve regulatory consistency, RCA consulted with JMT and counsel, and it was determined that the most prudent course of action would be to propose including NY Materials’ existing Chieftain 1700 screening unit in RCA’s ASF Permit. Notably, as of June 2024, NYSDEC still had not acted upon RCA’s timely ASF Permit Renewal Application, nearly one year past the August 24, 2023 due date for completeness determination.

Around the same time that the notice to renew NY Materials’ AFR was received, RCA sought to relocate an existing crusher and screen (a Telesmith Crusher and Simplicity Screener) used for processing RAP that are included in RCA’s ASF Permit. To account for both the equipment relocation and the consolidation of the NY Materials AFR and RCA ASF Permit, JMT, after consultation with RCA and RCA’s counsel, reached out to DAR to propose addressing this through an “Advanced Notification”—a regulatory method for documenting minor facility changes that meet certain criteria. Through Email correspondence dated June 27, 2024, DAR concurred with this approach.

Accordingly, on July 3, 2024, JMT provided DAR with an Advanced Notification for these activities. On August 7, 2024, DAR indicated that the Advanced Notification was accepted and that the Facility updates would be reflected in the renewed ASF Permit. As described in 6 NYCRR 201-5.4(d), an Advanced Notification is a change to the site that does not require NYSDEC review, provided specified conditions exist. Here, upon DAR’s acceptance of the Advanced Notification, the changes described therein became a part of the existing permit and no further review is required, other than to describe the change “in the facility’s next permit renewal or modification application.” (6 NYCRR 201-5.4(d),(f)).

Notably, the subject change was discussed with the Region 3 Regional Air Pollution Control Engineer (RAPCE) and NYSDEC Central Office Staff, who agreed that these activities were activities covered by Advanced Notification. For clarity, Figure 1: *Equipment Locations* is included, which illustrates both the location of the Chieftain 1700 authorized under NY Materials’ AFR and the nature of the Telesmith Crusher and Simplicity Screener relocation associated with RCA’s ASF Permit. The Advanced Notification accepted by the Department is also provided in Attachment I. For ease of review, the Email correspondence documenting DAR’s acceptance of the Advanced Notification is included as Attachment II, immediately after the Advanced Notification in Attachment I.

After another period of inactivity, NYSDEC provided RCA with a draft renewed ASF Permit on December 4, 2024. Following RCA’s review and clarification of permit conditions, RCA and DAR reached agreement on the draft Permit on January 29, 2025.

On February 24, 2025, a Region 3 Permit Analyst reached out for clarification regarding “new equipment” via Email. JMT, on behalf of RCA, was immediately responsive, and clarified that no new equipment was introduced—only an administrative consolidation of separate approvals. The response to the Permit Analyst included the prior correspondence with DAR included in Attachment II, which confirmed acceptance of the Advanced Notification. Notably, the Permit Analyst responded on March 3, 2025, that the renewal application was deemed complete and that NYSDEC staff were “...working on getting the renewal processed.” The Permit Analyst subsequently rescinded this determination on March 10, 2025, and provided no basis for this determination.

Following correspondence with the Permit Analyst in early 2025, several further months of NYSDEC inactivity commenced, notwithstanding that JMT, on behalf of RCA, regularly contacted NYSDEC for status updates.

On August 15, 2025, NYSDEC issued the RFAI that is the subject of this response. Notably, this occurred two (2) years after the timely ASF Permit Renewal Application was submitted, and more than six (6) months after RCA agreed to the draft Permit issued by DAR.

AUGUST 15, 2025 RFAI

In the introductory paragraph of the RFAI, NYSDEC states that “*The renewal application proposes minor changes, including the relocation of two emission points and the addition of a screener.*”

It is assumed that “...relocation of two emission points...” is in reference to the previously described relocated Telesmith Crusher and Simplicity Screener. JMT notes that these are emission *sources*, not emission *points*, which hold separate definitions under NYSDEC guidance materials. The RCA ASF includes one (1) emission point, the baghouse stack, which remains unchanged. It should be further noted that relocation of the Telesmith Crusher and Simplicity Screener has been authorized in accordance with DAR’s approval of the July 3, 2024 Advanced Notification. These activities are therefore not changes subject to review. See 6 NYCRR 201-5.4(d), (f). Further evidence of RCA’s efforts to maintain regulatory compliance is demonstrated by the fact that this relocation was also approved by the Westchester County Department of Health, which administers a local air permitting program.

Regarding NYSDEC’s statement the renewal application proposed “*the addition of a screener*”, the summary provided above details that the Chieftain 1700 screening unit is not “new” and has in fact been authorized and in operation since 2007. As previously described, this is a simple administrative consolidation of separate, longstanding authorizations. There are no changes to facility emissions. And, upon the Department’s acceptance of the Advanced Notification, this consolidation was effectively complete and is not subject to further review as part of the renewal of the ASF Permit.

In the RFAI, NYSDEC states that additional analyses... are required to complete review of the renewal application, including items related to the Climate Leadership and Community Protection Act (CLCPA), Environmental Justice, and the Uniform Procedures Act.

CLCPA

Notwithstanding that the Department previously finalized a draft ASF permit, it is now requesting that a CLCPA Section 7(2), and 7(3) Analysis be completed before review can be completed of the renewal application.

Regarding the Section 7(2) analysis, Division of Air Resources Program Policy 21 (“DAR-21”) provides useful guidance. Specifically, DAR-21 states:

“A permit renewal that does not include a significant modification, as described in Part 201, and would not lead to an increase in actual or potential GHG emissions would in most circumstances be considered consistent with the CLCPA pending finalization of the Scoping Plan and future regulations. However, DEC staff may require an applicant to submit a CLCPA analysis for a permit renewal to ensure the requirements of Section 7(2) are met, if the facts surrounding the project indicate that an analysis is warranted.”

Commissioner Policy 49 (CP-49) on Climate and DEC Action is a policy on how DEC complies with section 7(2) of the CLCPA , CP-49 states:

“Routine permit renewals that would not lead to an increase in actual or potential GHG emissions would ordinarily be considered consistent with the CLCPA pending finalizing of the Scoping Plan, the subsequent adoption of a state energy plan, and future regulations unless project specific facts support a finding of inconsistency.”

As detailed in prior sections of this letter, this application is a renewal and does not propose any modifications beyond the previously-approved administrative consolidation of approvals and relocation of existing emission sources. Furthermore, RCA seeks no changes to the existing emission limits of NOx and CO, both of which are combustion- related pollutants that inherently limit greenhouse gas (GHG). As no new combustion sources are included in this renewal application, and there is no potential for an increase in GHG emissions on a potential to emit (PTE) or actual basis, it is unclear what “facts surrounding the projects” justify NYSDEC’s request for a Section 7(2) Analysis. The RFAI has provided no basis for this request, which request also contravenes DAR-21 and CP-49. It is further unclear why such a request would be made by the Department two years after a timely renewal application was submitted, and more than six months after a draft permit was shared with RCA.

For these reasons, RCA respectfully requests that NYSDEC rescind the request for a CLCPA Section 7(2) Analysis.

Regarding the request for a Section 7(3) Analysis, NYSDEC’s Department of Environmental Permits Program Policy 24-1 (DEP 24-1) provides useful guidance. Specifically, DEP 24-1 states:

“Increases in GHG emissions or co-pollutants resulting from a project associated with any new, modified or renewed emission sources, including those from stationary or mobile sources directly related to and essential to the proposed action, will require the preparation of a disproportionate burden analysis to meet the completeness requirements of 6 NYCRR 621.3(a)(13).”

Given that a Section 7(3) analysis is a requirement only where a permit renewal includes an increase in emissions, no Section 7(3) analysis is required here. This renewal application does not include any new or modified GHG emission sources and will not result in an increase in GHG emissions on either an actual or PTE basis. It also proposes no increases in co-pollutants. There simply are no changes to emissions. Therefore, RCA respectfully requests that NYSDEC rescind the request for a Section 7(3) analysis. The applicant believes this request is further supported by the lengthy review process of this renewal application and the Department’s significant failure to adhere to statutory timeline requirements.

ENVIRONMENTAL JUSTICE

In the RFAI, NYSDEC states that items related to Environmental Justice are required, including an Enhanced Public Participation Plan, Existing Burden Analysis, and a Full Environmental Assessment Form (FEAF).

Of note, NYSDEC references DEP 24-1 and Commissioners Policy 29 (CP-29) as useful guidance.

As previously described, DEP 24-1 provides that a Section 7(3) is required for permit renewals only where there is an increase in emissions. Additionally, CP-29 provides that “[t]his policy shall not apply to permit applications for minor modifications, except as provided above, **nor to renewals**, registrations or general permits.” As such, based on the facts of the project and the Department’s failure to adhere to statutory review timelines, this requirement and the associated requirement in Department guidance for Environmental Justice should not be applicable.

NYSDEC further requests that a Full EAF be completed for the renewal application. NYSDEC guidance states: “The Full Environmental Assessment Form (FEAF) is used when a state or local agency has determined that a SEQR review is necessary, and they have identified the project as being a Type I Action.”

The pending application is a renewal and per 6 NYCRR 617.5 (c) (32) is precluded from environmental review under Environmental Conservation Law, Article 8. For this reason, RCA respectfully requests that NYSDEC withdraw the request for a State Environmental Quality Review Act (SEQRA) Full Environmental Assessment Form (FEAF) Part 1.

Based on the information contained in the NYSDEC-referenced guidance material, RCA respectfully requests the items related to Environmental Justice within the Department’s RFAI be rescinded.

UNIFORM PROCEDURES

In the RFAI, NYSDEC states that the pending ASF renewal application is a major project and cites 6 NYCRR Part 621.4(f), the air regulation, which includes a series of criteria establishing a project as major. It is unclear which criteria is or are the basis for statement in the RFAI regarding this application constituting a major permit. However, based on experience with comparable facilities and prior instances of confusion within the Department of Environmental Permits, JMT assumes it is 6 NYCRR Part 621.4(f) (2) (V): *projects requiring the use of a federally enforceable emission cap.*

However, it is important to note that the regulation cited by NYSDEC lacks an important clarification that is included in 6 NYCRR 201-5.4. Specifically, a project is only significant if it includes “changes that seek to establish or change a federally enforceable emissions cap or a permit term or condition that the facility has accepted to avoid an applicable requirement to which the facility would otherwise be subject.” (6 NYCRR 201-5.4(b)(1)(iv)). As RCA seeks no changes in the federally enforceable conditions that limit NOx and CO emissions, the permit renewal does not constitute a significant action.

RCA acknowledges that ASF permits, including renewals are considered major by default due to their status as delegated permits containing federally enforceable permit conditions, and therefore require public notice. However, as discussed above, as renewals are Type II actions, they are not subject to SEQR review.

We trust that the information contained herein adequately addresses the RFAI dated August 15, 2025, and that NYSDEC will commence with completion of the ASF Permit renewal. If NYSDEC disagrees, RCA respectfully requests an immediate meeting between NYSDEC, RCA, and JMT to discuss this matter further.

If you should have any questions or require further information, please do not hesitate to contact me at (518) 218-5639 or edavidson@jmt.com.

Sincerely,

JMT of New York, Inc.



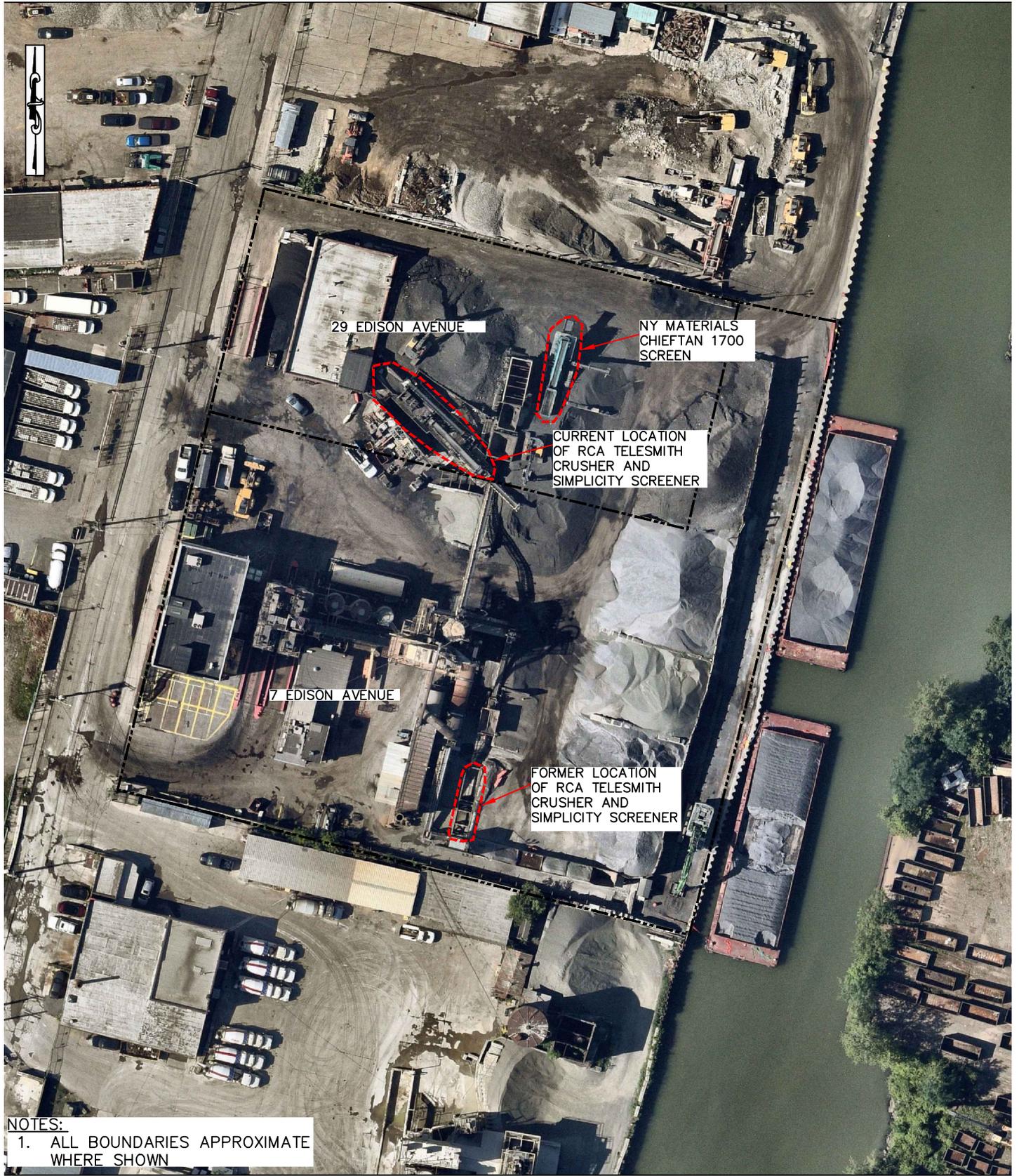
Edward G. Davidson, PG
Associate Vice President

Attachments

ecc w/ att.: D. Escarpeta, NYSDEC
 T. T-Quinn, NYSDEC
 A. Chin, NYSDEC
 K. Pickard-Depriest, NYSDEC
 A. Johnson, NYSDEC
 A. Giuda, Couch White
 C. Luccarelli, RCA
 A. Casterella, RCA
 D. Straw, JMT
 C. Carroll, JMT
 City of Mount Vernon Clerk



FIGURE



NOTES:

1. ALL BOUNDARIES APPROXIMATE WHERE SHOWN



19 British American Blvd., Latham, New York 12110
 P: (518) 782-0882 F: (518) 782-0973 www.jmt.com

EQUIPMENT LOCATIONS
 RCA ASPHALT, LCC
 RCA ASPHALT

CITY OF MOUNT VERNON

WESTCHESTER CO., NY



ATTACHMENT I

ADVANCE NOTIFICATION



July 3, 2024

Mr. Andrew Chin
Assistant Environmental Engineer
Division of Air Resources, Region 3
New York State Department of Environmental Conservation
21 South Putt Corners Road
New Paltz, New York 12561-1620

SUBMITTED VIA EMAIL

RE: RCA Asphalt, LLC – Mount Vernon Plant
DEC Facility: 3-5508-00133/00005
Mount Vernon, Westchester County
Advanced Notification – Batch Mix Asphalt Plant

Dear Mr. Chin:

JMT of New York, Inc. (JMT), on behalf of RCA Asphalt, LLC (RCA), respectfully submits this Advanced Notification to the New York State Department of Environmental Conservation (NYSDEC) pertaining to the consolidation of two facilities under one Air State Facility (ASF) Permit for the above referenced facility and NY Materials, LLC (NY Materials), and the proposed relocation of an existing recycled asphalt pavement (RAP) crusher and screen. Both facilities are commonly owned and administered. Included with this letter is Attachment I: *Facility Emissions Inventory*.

Background of Existing Approvals

As you are aware, RCA is located at 7 Edison Avenue and presently operates under an ASF Permit (3-5508-00133/00005). Authorized activities include the operation of a batch-mix asphalt plant and the crushing and screening of RAP material for the ultimate incorporation into HMA products on-site. Consistent with a request from the NYSDEC, RCA submitted a timely renewal application for their ASF on August 8th, 2023, but the NYSDEC has not yet acted on this application. The applicant is aware and understands, in most cases, NYSDEC is not currently processing renewal applications for asphalt facilities in anticipation of the repeal and replacement of 6 NYCRR Part 212.4: *Control of Nitrogen Oxides for Hot Mix Asphalt Production Plants* with 6 NYCRR Part 220.3: *Asphalt Manufacturing Plants*.

NY Materials is located at 29 Edison Avenue and presently operates under an Air Facility Registration (AFR 3-5508-01135/00001). 29 Edison Avenue is immediately adjacent to 7 Edison Avenue. Authorized activities include the screening and sorting of RAP. The RAP screen is powered by an exempt 110 horsepower onboard diesel fired engine. The existing AFR includes no expiration date, and consistent with regulatory updates to 6 NYCRR Part 201, NY Materials received a notice, dated June 4, 2024 from NYSDEC to renew the AFR.

Proposed Action

No new equipment, processes, or increase in production is proposed as part of this Advanced Notification.

The change is not a “significant modification” as described in 6 NYCRR 201-5.4(a), and it otherwise meets the requirements set forth in 6 NYCRR 201-5.4(d) for an Advance Notification. Instead, RCA proposes to relocate the RAP crusher and screen which is currently included in the facility’s ASF, located on 7 Edison Avenue to 29 Edison Avenue. The relocation is being proposed to improve site operations and movement around the cold feed bins for the asphalt plant. The move will also enable the facility to have more control of fugitive dust, as the new location is more self-contained and further away from the asphalt batch plant. Considering the planned relocation of equipment, pending renewals for the ASF and AFR, and common ownership and administration of the facilities, the permittee proposes to consolidate the AFR for NY Materials into the ASF for RCA Asphalt. This consolidation is being proposed to ensure that NYSDEC is aware of the proposed equipment relocation as set forth in the Advanced Notification requirements in 6 NYCRR 201-5.4 and to streamline record keeping and compliance requirements.

Furthermore, the permittee notes that per 6 NYCRR 201-3.2 (29) (iii), a facility that solely screens material (such as the current approval for NY Materials) is exempt from NYSDEC air regulations. The inconsistency of the existing AFR with the regulations is a further reason to incorporate the screen at NY Materials into the existing ASF for RCA.

To document the proposed relocation of the crusher and screen, the following Advanced Notification is being provided to the NYSDEC. The informational requirements of an Advanced Notification are provided per 6 CRR-NY 201-5.4 (e), and for ease of review are included below in italics, followed by the requested information.

- (1) identification of the emission unit(s), process(es), emission source(s), and emission point(s) affected by the proposed change;*

The crusher and screen being moved are in the RCA emissions unit “U-00RAP”. There is no change proposed aside from the inclusion of the screen currently covered by the NY Materials AFR into the U-00RAP emission unit of the ASF. The process (crushing and screening of RAP material) is identified as “PO4” in the ASF. The emission source ID for the crusher and screen being moved is “CRSH1” and “SCRN1”. The NY Materials screen will be identified as “SCRN2” once incorporated into the RCA Asphalt ASF. At present, the RCA ASF does not include emission point information for the U-00RAP emissions unit. This change does not result in any change to the total emissions currently authorized for the asphalt plant.

- (2) date on which the change is to occur;*

It is anticipated that the relocation of the existing RAP crusher and screen from 7 Edison to 29 Edison Ave will be completed by September 2024.

- (3) description of the proposed change;*

As described above, RCA Asphalt intends to move the existing RAP crusher and screen from 7 Edison Ave to 29 Edison Ave and is seeking to consolidate NYSDEC approvals for the two parcels under common ownership and administration.

- (1) if appropriate, the identification and description of emissions control technology and compliance terms;
and*

There are no new control technologies proposed as part of this equipment relocation. The new, combined ASF for the facility would include any compliance terms determined by NYSDEC as part of their review of the renewal applications and this request, however, RCA Asphalt proposes no new compliance requirements at this time.

- (2) the identification of all contaminants emitted by the affected emission sources and calculations of the emission rate potential, potential to emit, and projected actual annual emission rates after the proposed change.*

This Advance Notification will result in no change to the emissions that are regulated today. For detailed information on emissions, please refer to Attachment I: *Facility Emissions Inventory*.

We trust that the information contained herein adequately addresses the informational requirements of an Advanced Notification. Furthermore, it is the permittees' understanding that this submittal satisfies the NYSDEC request that an AFR renewal for the NY Materials facility be submitted to NYSDEC by July 10, 2024. We kindly ask that NYSDEC acknowledge this understanding for our records. If you should have any questions or require further information, please do not hesitate to contact me at (518) 218-5953 or dstraw@jmt.com.

Sincerely,

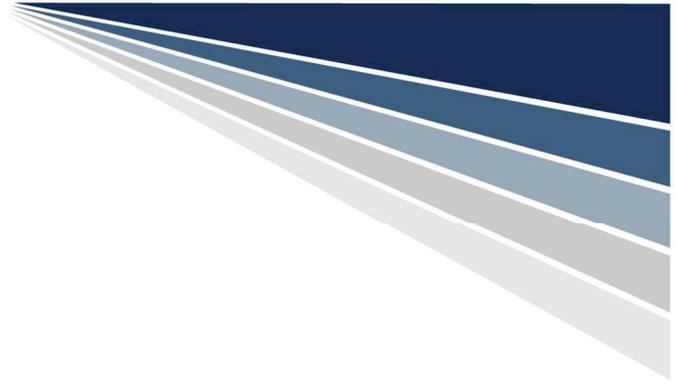
JMT of New York, Inc.



David T. Straw
Associate

Attachments

ecc w/ att.: C. Luccarelli, RCA
 D. Amicucci, NYM
 A. Giuda, Couch White
 C. Carroll, JMT



ATTACHMENT I

FACILITY EMISSIONS INVENTORY

**RCA Asphalt
Mount Vernon, NY Plant
Facility Emissions Summary
Criteria Pollutants and Total HAPs**

Facility Total Estimated Actual Annual Emissions*	lb/yr	TPY
NOx:	20,928	10.46
SO₂:	2,190	1.09
CO:	192,015	96
VOC:	697.43	3.49E-01
Lead:	4.23E-01	2.11E-04
PM₁₀:	15,124	7.56
total HAP	3,687	1.84

Facility Total Estimated PTE Annual Emissions*	lb/yr	TPY
NOx:	122,795	61.40
SO₂:	17,058	8.53
CO:	1,488,775	744.39
VOC:	32,770	16.38
Lead:	3.3	1.65E-03
PM₁₀:	107,818	53.91
total HAP	28,731	14.37

*Note: The Facility's principal fuel source for the dryer burner is natural gas. Estimated Facility actual and PTE emissions are reflective of emissions from the batch plant when firing natural gas as well as PM10 from the RAP plant

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
Criteria Pollutants
Estimated Actual Emissions**

I. **Fuel:** **Nat. Gas** (Process: P01)
Annual Production, ton/yr: 475,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 1,123

Operating hours and annual production figures are for calculation purposes only and are not to be considered permit limits.

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

Natural Gas Emission

Factors ¹		lb/hr	lb/yr	TPY
NOx, lb/ton	0.025	10.58	11,875	5.94
SO ₂ , lb/ton	0.0046	1.95	2,185	1.09
CO, lb/ton	0.40	169.20	190,000	95.00
VOC, lb/ton	0.0082	3.47	3,895	1.95
Lead, lb/ton	8.9E-07	3.8E-04	4.2E-01	2.1E-04
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	12,825	6.41

II. **Fuel:** **No. 2 Fuel Oil** (Process: P02)
Annual Production, ton/yr: 365,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 863

Operating hours and annual production figures are for calculation purposes only and are not to be considered permit limits.

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

No. 2 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	43,800	21.90
SO ₂ , lb/ton	0.0880	37.22	32,120	16.06
CO, lb/ton	0.40	169.20	146,000	73.00
VOC, lb/ton	0.0082	3.47	2,993	1.50
Lead, lb/ton	8.9E-07	3.76E-04	3.E-01	1.62E-04
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	9,855	4.93

1. AP-42 11.1, "Hot Mix Asphalt Plants" 12/04, Tables 11.1-1, 5, 6, & 11 (Batch Mix Plant)

III. **Fuel:** **No. 4 & 6 Fuel Oil** (Process: P03)
Annual Production, ton/yr: 365,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 863

Operating hours and annual production figures are for calculation purposes only and are not to be considered permit limits.

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

No. 4 & 6 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	43,800	21.90
SO ₂ , lb/ton	0.0880	37.22	32,120	16.06
CO, lb/ton	0.40	169.20	146,000	73.00
VOC, lb/ton	0.0360	15.23	13,140	6.57
Lead, lb/ton	8.9E-07	3.76E-04	3.E-01	1.62E-04
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	9,855	4.93

1. AP-42 11.1, "Hot Mix Asphalt Plants" 12/04, Tables 11.1-1, 5, 6, & 11 (Batch Mix Plant)

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
Criteria Pollutants
Estimated PTE Emissions**

I.	Fuel:	Nat. Gas	(Process: P01)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

Natural Gas Emission

Factors ¹		lb/hr	lb/yr	TPY
NOx, lb/ton	0.025	10.58	92,637	46.32
SO ₂ , lb/ton	0.0046	1.95	17,045	8.52
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0082	3.47	30,385	15.19
Lead, lb/ton	8.9E-07	3.8E-04	3.3E+00	1.6E-03
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	100,048	50.02

II.	Fuel:	No. 2 Fuel Oil	(Process: P02)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

No. 2 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	444,658	222.33
SO ₂ , lb/ton	0.0880	37.22	326,082	163.04
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0082	3.47	30,385	15.19
Lead, lb/ton	8.9E-07	3.76E-04	3	1.65E-03
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	100,048	50.02

III.	Fuel:	No. 4 & 6 Fuel Oil	(Process: P03)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source/Control: BAG1, BURN1

No. 4 & 6 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	444,658	222.33
SO ₂ , lb/ton	0.0880	37.22	326,082	163.04
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0360	15.23	133,397	66.70
Lead, lb/ton	8.9E-07	3.76E-04	3	1.65E-03
PM ₁₀ (fabric filter), lb/ton	0.027	11.42	100,048	50.02

1. AP-42 11.1, "Hot Mix Asphalt Plants" 12/04, Tables 11.1-1, 5, 6, & 11 (Batch Mix Plant)

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
Criteria Pollutants
Estimated ERP Emissions**

Note: For all pollutants except PM, ERP=PTE

I.	Fuel:	Nat. Gas	(Process: P01)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source: BURN1

Natural Gas Emission

Factors ¹		lb/hr	lb/yr	TPY
NOx, lb/ton	0.025	10.58	92,637	46.32
SO ₂ , lb/ton	0.0046	1.95	17,045	8.52
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0082	3.47	30,385	15.19
Lead, lb/ton	8.9E-07	3.8E-04	3.3E+00	1.6E-03
PM ₁₀ (uncontrolled), lb/ton	4.5	1,904	16,674,660	8,337

II.	Fuel:	No. 2 Fuel Oil	(Process: P02)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source: BURN1

No. 2 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	444,658	222.33
SO ₂ , lb/ton	0.0880	37.22	326,082	163.04
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0082	3.47	30,385	15.19
Lead, lb/ton	8.9E-07	3.76E-04	3	1.65E-03
PM ₁₀ (uncontrolled), lb/ton	4.5	1,904	16,674,660	8,337

III.	Fuel:	No. 4 & 6 Fuel Oil	(Process: P03)
	Annual Production, ton/yr:	3,705,480	
	Typical Production Rate, tons/hr:	423	
	Assumed Operating Hours per Year:	8,760	

Operating hours and emissions are for demonstrative purposes only

Emission Point: 00009 Emission Source: BURN1

No. 4 & 6 Oil Emission

Factors		lb/hr	lb/yr	TPY
NOx, lb/ton	0.120	50.76	444,658	222.33
SO ₂ , lb/ton	0.0880	37.22	326,082	163.04
CO, lb/ton	0.40	169.20	1,482,192	741.10
VOC, lb/ton	0.0360	15.23	133,397	66.70
Lead, lb/ton	8.9E-07	3.76E-04	3	1.65E-03
PM ₁₀ (uncontrolled), lb/ton	4.5	1,904	16,674,660	8,337

1. AP-42 11.1, "Hot Mix Asphalt Plants" 12/04, Tables 11.1-1, 5, 6, & 11 (Batch Mix Plant)

**RCA Asphalt
Mount Vernon, NY Plant
Exempt Liquid Asphalt Heater
Criteria Pollutants
Estimated Actual, PTE, and ERP Emissions**

Note: Exempt per 6 NYCRR 201-3.2 (c) (1) (i)

I. Natural Gas - Estimated Actual Emissions

Heat Rating, BTU/hr	500,000	Operating Season, months:	9 approximate
Nat. Gas, BTU/scf	1,000	Operating Season, days:	274
Nat. Gas, scf/hr	500	Operating Season, hrs:	6,570 * (heat req'd 24 hr/day)
Operating (Heating) Hrs/yr	6,570		
Nat. Gas, mmscf/yr	3.29		

Contaminant	lb/mmscf ¹	Emissions Per Unit		
		(lb/hr)	(lb/yr)	(tpy)
NOx	94	0.0470	308.79	0.15
PM	7.6	0.0038	24.97	0.01
PM10	7.6	0.0038	24.97	0.01
SO2	0.6	0.0003	1.97	0.00
CO	40	0.0200	131.40	0.07
VOC	5.5	0.0028	18.07	0.01

II. Natural Gas - Estimated PTE/ERP Emissions

Heat Rating, BTU/hr	500,000	Operating Season, months:	12 approximate
Nat. Gas, BTU/scf	1,000	Operating Season, days:	365
Nat. Gas, scf/hr	500	Operating Season, hrs:	8,760 * (heat req'd 24 hr/day)
Operating (Heating) Hrs/yr	8,760		
Nat. Gas, mmscf/yr	4.38		

Contaminant	lb/mmscf ¹	Emissions Per Unit		
		(lb/hr)	(lb/yr)	(tpy)
NOx	94	0.0470	411.72	0.21
PM	7.6	0.0038	33.29	0.02
PM10	7.6	0.0038	33.29	0.02
SO2	0.6	0.0003	2.63	0.00
CO	40	0.0200	175.20	0.09
VOC	5.5	0.0028	24.09	0.01

III. No. 2 Fuel Oil- Estimated Actual Emissions

Heat Rating, BTU/hr	500,000	Operating Season, months:	9 approximate
#2 Oil, BTU/gal.	137,000	Operating Season, days:	274
#2 Oil, gal/hr	3.65	Operating Season, hrs:	6,570 * (heat req'd 24 hr/day)
Operating (Heating) Hrs/yr	6,570		
#2 Oil, gal/yr	23,978		
#2 Oil Sulfur Content, %	0.0015	ULSD (ultra low sulfur diesel)	

Contaminant	(lb/10 ³ gal) ²	(lb/hr)	(lb/yr)	(tpy)
NOx	20.00	0.0730	479.56	0.24
PM	2.00	0.0073	47.96	0.02
PM10	2.00	0.0073	47.96	0.02
SO2	0.21	0.0008	5.11	0.00
CO	5.00	0.0182	119.89	0.06
VOC	0.34	0.0012	8.15	0.00

IV. No. 2 Fuel Oil- Estimated PTE/ERP Emissions

Heat Rating, BTU/hr	500,000	Operating Season, months:	12 approximate
#2 Oil, BTU/gal.	137,000	Operating Season, days:	365
#2 Oil, gal/hr	3.65	Operating Season, hrs:	8,760 * (heat req'd 24 hr/day)
Operating (Heating) Hrs/yr	8,760		
#2 Oil, gal/yr	31,971		
#2 Oil Sulfur Content, %	0.0015	ULSD (ultra low sulfur diesel)	

Contaminant	(lb/10 ³ gal) ²	(lb/hr)	(lb/yr)	(tpy)
NOx	20.00	0.0730	639.42	0.32
PM	2.00	0.0073	63.94	0.03
PM10	2.00	0.0073	63.94	0.03
SO2	0.21	0.0008	6.81	0.00
CO	5.00	0.0182	159.85	0.08
VOC	0.34	0.0012	10.87	0.01

* All calculations on this page are overly conservative.

¹USEPA AP-42 Chapter 1.1, Natural Gas Combustion, Tables 1.4-1 & 1.4-2.

²USEPA AP-42 Chapter 1.3, Fuel Oil Combustion, Tables 1.3-1 & 1.3-3.

**RCA Asphalt
Mount Vernon, NY Plant
RAP (U-00RAP)
HAPs
Estimated Actual and PTE Emissions**

Note: Exempt per 6 CRR-NY 201-3.2 3(ii)

Estimated Actual Emissions

Engine CAT C4.4 (110 HP)	
Fuel Rate , gal/yr	14,473
Diesel fuel, BTU/gal	137,000
mmBTU/yr	1,983

Estimated PTE Emissions

Engine CAT C4.4 (110 HP)	
Fuel Rate , gal/yr	49,235
Diesel fuel, BTU/gal	137,000
mmBTU/yr	6,745

Pollutant	EF*	lb/mmBTU	lb/yr
Benzene	9.33E-04		1.85
Toluene	4.09E-04		0.81
Xylenes	2.85E-04		0.57
1,3-Butadiene	3.91E-05		0.08
Formaldehyde	1.18E-03		2.34
Acetaldehyde	7.67E-04		1.52
Acrolein	9.25E-05		0.18
Naphthalene	8.48E-05		0.17

Pollutant	EF*	lb/mmBTU	lb/yr
Benzene	9.33E-04		6.29
Toluene	4.09E-04		2.76
Xylenes	2.85E-04		1.92
1,3-Butadiene	3.91E-05		0.26
Formaldehyde	1.18E-03		7.96
Acetaldehyde	7.67E-04		5.17
Acrolein	9.25E-05		0.62
Naphthalene	8.48E-05		0.57

*(AP-42 Table 3.3-2)

*(AP-42 Table 3.3-2)

	lb/yr	tpy
Total, Actual	7.52	0.004

	lb/yr	tpy
Total PTE	25.57	0.013

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
HAPs
Estimated Actual Emissions
Natural Gas**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: Natural Gas

Annual Production, ton/yr: 475,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 1,123

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.52E+02	7.60E-02
Quinone	2.70E-04	1.14E-01	1.28E+02	6.41E-02
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	4.51E-05	2.26E-08
Chromium (VI)	4.80E-08	2.03E-05	2.28E-02	1.14E-05
Benzene	2.80E-04	1.184E-01	1.33E+02	6.65E-02
Ethylbenzene	2.20E-03	9.306E-01	1.05E+03	5.23E-01
Formaldehyde	7.40E-04	3.130E-01	3.52E+02	1.76E-01
Toluene	1.00E-03	4.230E-01	4.75E+02	2.38E-01
Xylene	2.70E-03	1.142E+00	1.28E+03	6.41E-01
2-Methylnaphthalene	7.10E-05	3.003E-02	3.37E+01	1.69E-02
Acenaphthene	9.00E-07	3.807E-04	4.28E-01	2.14E-04
Acenaphthylene	5.80E-07	2.453E-04	2.76E-01	1.38E-04
Anthracene	2.10E-07	8.883E-05	9.98E-02	4.99E-05
Benzo(a)anthracene	4.60E-09	1.946E-06	2.19E-03	1.09E-06
Benzo(a)pyrene	3.10E-10	1.311E-07	1.47E-04	7.36E-08
Benzo(b)fluoranthene	9.40E-09	3.976E-06	4.47E-03	2.23E-06
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	2.38E-04	1.19E-07
Benzo(k)fluoranthene	1.30E-08	5.499E-06	6.18E-03	3.09E-06
Chrysene	3.80E-09	1.607E-06	1.81E-03	9.03E-07
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	4.51E-05	2.26E-08
Fluoranthene	1.60E-07	6.768E-05	7.60E-02	3.80E-05
Fluorene	1.60E-06	6.768E-04	7.60E-01	3.80E-04
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.43E-04	7.13E-08
Naphthalene	3.60E-05	1.523E-02	1.71E+01	8.55E-03
Phenanthrene	2.60E-06	1.100E-03	1.24E+00	6.18E-04
Pyrene	6.20E-08	2.623E-05	2.95E-02	1.47E-05
Arsenic	4.60E-07	1.946E-04	2.19E-01	1.09E-04
Beryllium	1.50E-07	6.345E-05	7.13E-02	3.56E-05
Cadium	6.10E-07	2.580E-04	2.90E-01	1.45E-04
Chromium	5.70E-07	2.411E-04	2.71E-01	1.35E-04
total PAHs	1.10E-04	4.653E-02	5.23E+01	2.61E-02
Lead	8.90E-07	3.765E-04	4.23E-01	2.11E-04
Manganese	6.90E-06	2.919E-03	3.28E+00	1.64E-03
Mercury	4.10E-07	1.734E-04	1.95E-01	9.74E-05
Nickel	3.00E-06	1.269E-03	1.43E+00	7.13E-04
Selenium	4.90E-07	2.073E-04	2.33E-01	1.16E-04
total HAPS	7.75E-03	3.28	3679.67	1.840

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
HAPs
Estimated PTE Emissions
Natural Gas**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: Natural Gas

Annual Production, ton/yr: 3,705,480
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 8,760

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.19E+03	5.93E-01
Quinone	2.70E-04	1.14E-01	1.00E+03	5.00E-01
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	3.52E-04	1.76E-07
Chromium (VI)	4.80E-08	2.03E-05	1.78E-01	8.89E-05
Benzene	2.80E-04	1.184E-01	1.04E+03	5.19E-01
Ethylbenzene	2.20E-03	9.306E-01	8.15E+03	4.08E+00
Formaldehyde	7.40E-04	3.130E-01	2.74E+03	1.37E+00
Toluene	1.00E-03	4.230E-01	3.71E+03	1.85E+00
Xylene	2.70E-03	1.142E+00	1.00E+04	5.00E+00
2-Methylnaphthalene	7.10E-05	3.003E-02	2.63E+02	1.32E-01
Acenaphthene	9.00E-07	3.807E-04	3.33E+00	1.67E-03
Acenaphthylene	5.80E-07	2.453E-04	2.15E+00	1.07E-03
Anthracene	2.10E-07	8.883E-05	7.78E-01	3.89E-04
Benzo(a)anthracene	4.60E-09	1.946E-06	1.70E-02	8.52E-06
Benzo(a)pyrene	3.10E-10	1.311E-07	1.15E-03	5.74E-07
Benzo(b)fluoranthene	9.40E-09	3.976E-06	3.48E-02	1.74E-05
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	1.85E-03	9.26E-07
Benzo(k)fluoranthene	1.30E-08	5.499E-06	4.82E-02	2.41E-05
Chrysene	3.80E-09	1.607E-06	1.41E-02	7.04E-06
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	3.52E-04	1.76E-07
Fluoranthene	1.60E-07	6.768E-05	5.93E-01	2.96E-04
Fluorene	1.60E-06	6.768E-04	5.93E+00	2.96E-03
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.11E-03	5.56E-07
Naphthalene	3.60E-05	1.523E-02	1.33E+02	6.67E-02
Phenanthrene	2.60E-06	1.100E-03	9.63E+00	4.82E-03
Pyrene	6.20E-08	2.623E-05	2.30E-01	1.15E-04
Arsenic	4.60E-07	1.946E-04	1.70E+00	8.52E-04
Beryllium	1.50E-07	6.345E-05	5.56E-01	2.78E-04
Cadium	6.10E-07	2.580E-04	2.26E+00	1.13E-03
Chromium	5.70E-07	2.411E-04	2.11E+00	1.06E-03
total PAHs	1.10E-04	4.653E-02	4.08E+02	2.04E-01
Lead	8.90E-07	3.765E-04	3.30E+00	1.65E-03
Manganese	6.90E-06	2.919E-03	2.56E+01	1.28E-02
Mercury	4.10E-07	1.734E-04	1.52E+00	7.60E-04
Nickel	3.00E-06	1.269E-03	1.11E+01	5.56E-03
Selenium	4.90E-07	2.073E-04	1.82E+00	9.08E-04
total HAPs	7.75E-03	3.28	28705.14	14.353

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
HAPs
Estimated Actual Emissions
No. 2 Fuel Oil**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: No. 2 Fuel Oil

Annual Production, ton/yr: 365,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 863

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.17E+02	5.84E-02
Quinone	2.70E-04	1.14E-01	9.86E+01	4.93E-02
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	3.47E-05	1.73E-08
Chromium (VI)	4.80E-08	2.03E-05	1.75E-02	8.76E-06
Benzene	2.80E-04	1.184E-01	1.02E+02	5.11E-02
Ethylbenzene	2.20E-03	9.306E-01	8.03E+02	4.02E-01
Formaldehyde	7.40E-04	3.130E-01	2.70E+02	1.35E-01
Toluene	1.00E-03	4.230E-01	3.65E+02	1.83E-01
Xylene	2.70E-03	1.142E+00	9.86E+02	4.93E-01
2-Methylnaphthalene	7.10E-05	3.003E-02	2.59E+01	1.30E-02
Acenaphthene	9.00E-07	3.807E-04	3.29E-01	1.64E-04
Acenaphthylene	5.80E-07	2.453E-04	2.12E-01	1.06E-04
Anthracene	2.10E-07	8.883E-05	7.67E-02	3.83E-05
Benzo(a)anthracene	4.60E-09	1.946E-06	1.68E-03	8.40E-07
Benzo(a)pyrene	3.10E-10	1.311E-07	1.13E-04	5.66E-08
Benzo(b)fluoranthene	9.40E-09	3.976E-06	3.43E-03	1.72E-06
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	1.83E-04	9.13E-08
Benzo(k)fluoranthene	1.30E-08	5.499E-06	4.75E-03	2.37E-06
Chrysene	3.80E-09	1.607E-06	1.39E-03	6.94E-07
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	3.47E-05	1.73E-08
Fluoranthene	1.60E-07	6.768E-05	5.84E-02	2.92E-05
Fluorene	1.60E-06	6.768E-04	5.84E-01	2.92E-04
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.10E-04	5.48E-08
Naphthalene	3.60E-05	1.523E-02	1.31E+01	6.57E-03
Phenanthrene	2.60E-06	1.100E-03	9.49E-01	4.75E-04
Pyrene	6.20E-08	2.623E-05	2.26E-02	1.13E-05
Arsenic	4.60E-07	1.946E-04	1.68E-01	8.40E-05
Beryllium	1.50E-07	6.345E-05	5.48E-02	2.74E-05
Cadium	6.10E-07	2.580E-04	2.23E-01	1.11E-04
Chromium	5.70E-07	2.411E-04	2.08E-01	1.04E-04
total PAHs	1.10E-04	4.653E-02	4.02E+01	2.01E-02
Lead	8.90E-07	3.765E-04	3.25E-01	1.62E-04
Manganese	6.90E-06	2.919E-03	2.52E+00	1.26E-03
Mercury	4.10E-07	1.734E-04	1.50E-01	7.48E-05
Nickel	3.00E-06	1.269E-03	1.10E+00	5.48E-04
Selenium	4.90E-07	2.073E-04	1.79E-01	8.94E-05
total HAPS	7.75E-03	3.28	2827.54	1.414

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
HAPs
Estimated PTE Emissions
No. 2 Fuel Oil**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: No. 2 Fuel Oil

Annual Production, ton/yr: 3,705,480

Typical Production Rate, tons/hr: 423

Assumed Operating Hours per Year: 8,760

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.19E+03	5.93E-01
Quinone	2.70E-04	1.14E-01	1.00E+03	5.00E-01
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	3.52E-04	1.76E-07
Chromium (VI)	4.80E-08	2.03E-05	1.78E-01	8.89E-05
Benzene	2.80E-04	1.184E-01	1.04E+03	5.19E-01
Ethylbenzene	2.20E-03	9.306E-01	8.15E+03	4.08E+00
Formaldehyde	7.40E-04	3.130E-01	2.74E+03	1.37E+00
Toluene	1.00E-03	4.230E-01	3.71E+03	1.85E+00
Xylene	2.70E-03	1.142E+00	1.00E+04	5.00E+00
2-Methylnaphthalene	7.10E-05	3.003E-02	2.63E+02	1.32E-01
Acenaphthene	9.00E-07	3.807E-04	3.33E+00	1.67E-03
Acenaphthylene	5.80E-07	2.453E-04	2.15E+00	1.07E-03
Anthracene	2.10E-07	8.883E-05	7.78E-01	3.89E-04
Benzo(a)anthracene	4.60E-09	1.946E-06	1.70E-02	8.52E-06
Benzo(a)pyrene	3.10E-10	1.311E-07	1.15E-03	5.74E-07
Benzo(b)fluoranthene	9.40E-09	3.976E-06	3.48E-02	1.74E-05
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	1.85E-03	9.26E-07
Benzo(k)fluoranthene	1.30E-08	5.499E-06	4.82E-02	2.41E-05
Chrysene	3.80E-09	1.607E-06	1.41E-02	7.04E-06
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	3.52E-04	1.76E-07
Fluoranthene	1.60E-07	6.768E-05	5.93E-01	2.96E-04
Fluorene	1.60E-06	6.768E-04	5.93E+00	2.96E-03
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.11E-03	5.56E-07
Naphthalene	3.60E-05	1.523E-02	1.33E+02	6.67E-02
Phenanthrene	2.60E-06	1.100E-03	9.63E+00	4.82E-03
Pyrene	6.20E-08	2.623E-05	2.30E-01	1.15E-04
Arsenic	4.60E-07	1.946E-04	1.70E+00	8.52E-04
Beryllium	1.50E-07	6.345E-05	5.56E-01	2.78E-04
Cadium	6.10E-07	2.580E-04	2.26E+00	1.13E-03
Chromium	5.70E-07	2.411E-04	2.11E+00	1.06E-03
total PAHs	1.10E-04	4.653E-02	4.08E+02	2.04E-01
Lead	8.90E-07	3.765E-04	3.30E+00	1.65E-03
Manganese	6.90E-06	2.919E-03	2.56E+01	1.28E-02
Mercury	4.10E-07	1.734E-04	1.52E+00	7.60E-04
Nickel	3.00E-06	1.269E-03	1.11E+01	5.56E-03
Selenium	4.90E-07	2.073E-04	1.82E+00	9.08E-04
total HAPS	7.75E-03	3.28	28705.14	14.353

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)
HAPs
Estimated Actual Emissions
No. 4, 6 Fuel Oil**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: No. 4 & 6 Fuel Oil

Annual Production, ton/yr: 365,000
Typical Production Rate, tons/hr: 423
Assumed Operating Hours per Year: 863

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.17E+02	5.84E-02
Quinone	2.70E-04	1.14E-01	9.86E+01	4.93E-02
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	3.47E-05	1.73E-08
Chromium (VI)	4.80E-08	2.03E-05	1.75E-02	8.76E-06
Benzene	2.80E-04	1.184E-01	1.02E+02	5.11E-02
Ethylbenzene	2.20E-03	9.306E-01	8.03E+02	4.02E-01
Formaldehyde	7.40E-04	3.130E-01	2.70E+02	1.35E-01
Toluene	1.00E-03	4.230E-01	3.65E+02	1.83E-01
Xylene	2.70E-03	1.142E+00	9.86E+02	4.93E-01
2-Methylnaphthalene	7.10E-05	3.003E-02	2.59E+01	1.30E-02
Acenaphthene	9.00E-07	3.807E-04	3.29E-01	1.64E-04
Acenaphthylene	5.80E-07	2.453E-04	2.12E-01	1.06E-04
Anthracene	2.10E-07	8.883E-05	7.67E-02	3.83E-05
Benzo(a)anthracene	4.60E-09	1.946E-06	1.68E-03	8.40E-07
Benzo(a)pyrene	3.10E-10	1.311E-07	1.13E-04	5.66E-08
Benzo(b)fluoranthene	9.40E-09	3.976E-06	3.43E-03	1.72E-06
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	1.83E-04	9.13E-08
Benzo(k)fluoranthene	1.30E-08	5.499E-06	4.75E-03	2.37E-06
Chrysene	3.80E-09	1.607E-06	1.39E-03	6.94E-07
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	3.47E-05	1.73E-08
Fluoranthene	2.40E-05	1.015E-02	8.76E+00	4.38E-03
Fluorene	1.60E-06	6.768E-04	5.84E-01	2.92E-04
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.10E-04	5.48E-08
Naphthalene	3.60E-05	1.523E-02	1.31E+01	6.57E-03
Phenanthrene	3.70E-05	1.565E-02	1.35E+01	6.75E-03
Pyrene	5.50E-05	2.327E-02	2.01E+01	1.00E-02
Arsenic	4.60E-07	1.946E-04	1.68E-01	8.40E-05
Beryllium	1.50E-07	6.345E-05	5.48E-02	2.74E-05
Cadium	6.10E-07	2.580E-04	2.23E-01	1.11E-04
Chromium	5.70E-07	2.411E-04	2.08E-01	1.04E-04
total PAHs	2.30E-04	9.729E-02	8.40E+01	4.20E-02
Lead	1.00E-05	4.230E-03	3.65E+00	1.83E-03
Manganese	6.90E-06	2.919E-03	2.52E+00	1.26E-03
Mercury	4.10E-07	1.734E-04	1.50E-01	7.48E-05
Nickel	3.00E-06	1.269E-03	1.10E+00	5.48E-04
Selenium	4.90E-07	2.073E-04	1.79E-01	8.94E-05
total HAPS	7.99E-03	3.38	2915.97	1.458

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9

**RCA Asphalt
Mount Vernon, NY Plant
Batch Mix Plant (U-00HMP)**

**HAPs
Estimated PTE Emissions
No. 4, 6 Fuel Oil**

Emission Point: 00009

Emission Source/Control: BAG1, BURN2

Fuel: No. 4 & 6 Fuel Oil

Annual Production, ton/yr: 3,705,480

Typical Production Rate, tons/hr: 423

Assumed Operating Hours per Year: 8,760

HAPs	EF ¹ lb/ton	Emissions lb/hr	Emissions lb/yr	Emissions tpy
Acetaldehyde	3.20E-04	1.35E-01	1.19E+03	5.93E-01
Quinone	2.70E-04	1.14E-01	1.00E+03	5.00E-01
Dibenz(a,h)anthracene	9.50E-11	4.02E-08	3.52E-04	1.76E-07
Chromium (VI)	4.80E-08	2.03E-05	1.78E-01	8.89E-05
Benzene	2.80E-04	1.184E-01	1.04E+03	5.19E-01
Ethylbenzene	2.20E-03	9.306E-01	8.15E+03	4.08E+00
Formaldehyde	7.40E-04	3.130E-01	2.74E+03	1.37E+00
Toluene	1.00E-03	4.230E-01	3.71E+03	1.85E+00
Xylene	2.70E-03	1.142E+00	1.00E+04	5.00E+00
2-Methylnaphthalene	7.10E-05	3.003E-02	2.63E+02	1.32E-01
Acenaphthene	9.00E-07	3.807E-04	3.33E+00	1.67E-03
Acenaphthylene	5.80E-07	2.453E-04	2.15E+00	1.07E-03
Anthracene	2.10E-07	8.883E-05	7.78E-01	3.89E-04
Benzo(a)anthracene	4.60E-09	1.946E-06	1.70E-02	8.52E-06
Benzo(a)pyrene	3.10E-10	1.311E-07	1.15E-03	5.74E-07
Benzo(b)fluoranthene	9.40E-09	3.976E-06	3.48E-02	1.74E-05
Benzo(g,h,i)perylene	5.00E-10	2.115E-07	1.85E-03	9.26E-07
Benzo(k)fluoranthene	1.30E-08	5.499E-06	4.82E-02	2.41E-05
Chrysene	3.80E-09	1.607E-06	1.41E-02	7.04E-06
Dibenz(a,h)anthracenec	9.50E-11	4.019E-08	3.52E-04	1.76E-07
Fluoranthene	2.40E-05	1.015E-02	8.89E+01	4.45E-02
Fluorene	1.60E-06	6.768E-04	5.93E+00	2.96E-03
Indeno(1,2,3-cd)pyrene	3.00E-10	1.269E-07	1.11E-03	5.56E-07
Naphthalene	3.60E-05	1.523E-02	1.33E+02	6.67E-02
Phenanthrene	3.70E-05	1.565E-02	1.37E+02	6.86E-02
Pyrene	5.50E-05	2.327E-02	2.04E+02	1.02E-01
Arsenic	4.60E-07	1.946E-04	1.70E+00	8.52E-04
Beryllium	1.50E-07	6.345E-05	5.56E-01	2.78E-04
Cadium	6.10E-07	2.580E-04	2.26E+00	1.13E-03
Chromium	5.70E-07	2.411E-04	2.11E+00	1.06E-03
total PAHs	2.30E-04	9.729E-02	8.52E+02	4.26E-01
Lead	1.00E-05	4.230E-03	3.71E+01	1.85E-02
Manganese	6.90E-06	2.919E-03	2.56E+01	1.28E-02
Mercury	4.10E-07	1.734E-04	1.52E+00	7.60E-04
Nickel	3.00E-06	1.269E-03	1.11E+01	5.56E-03
Selenium	4.90E-07	2.073E-04	1.82E+00	9.08E-04
total HAPS	7.99E-03	3.38	29602.93	14.801

¹Emissions Per AP-42 Chapter 11.1 Hot Mix Asphalt Plants-Table 11.1-9



ATTACHMENT II

DAR CORRESPONDENCE

Straw, David

From: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Sent: Wednesday, August 7, 2024 3:04 PM
To: Straw, David
Cc: Carroll, Alexandra; Escarpeta, Densford (DEC)
Subject: [EXTERNAL] RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

Cyber Security Reminder: Please use caution - message originated outside JMT.

David,

Sorry, for the delay in response. I have received the documents from you previous email. I will represent these changes in the permit draft. Also, I will accept the advanced notification to move the emission unit from N Y Materials to RCA Asphalt since this will not increase overall emissions. When the working copy of the permit is ready I will send it to you for a chance to comment before proceeding in the next steps to issue the permit.

Andrew Chin

From: Straw, David <DStraw@jmt.com>
Sent: Wednesday, July 31, 2024 5:30 PM
To: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Cc: Carroll, Alexandra <ACarroll@jmt.com>; Escarpeta, Densford (DEC) <densford.escarpeta@dec.ny.gov>
Subject: FW: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005
Importance: High

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Andrew,

Could you kindly acknowledge receipt of this email and provide either a response or a timeline for DEC's response?

Thank you,
David

JMT of New York, Inc.
An Employee-Owned Company

David T. Straw, GIT
Associate
Special Projects
(518) 782-0882

From: Straw, David <DStraw@jmt.com>
Sent: Friday, July 26, 2024 2:50 PM
To: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>

Cc: Carroll, Alexandra <ACarroll@jmt.com>; Escarpeta, Densford (DEC) <densford.escarpeta@dec.ny.gov>
Subject: RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

Andrew,

The RCA renewal application has been in Department review for nearly a year without any action. The June 4, 2024 renewal notice for NY Materials (see attached) contains contradictory information. Specifically, the letter asked for a renewal application within 90 days, but included a due date of July 10, 2024, which ensued a lot of confusion. It also should not be overlooked that the Permittee has been patient during this entire process. They have made every effort to ensure timely submittals, and even reach out to DEC to pursue this update, as a good-faith effort of open communication. As such, we kindly request DEC's timely review and immediate responses to the two items outlined below.

That said, the Permittee is committed to maintaining a cooperative relationship with DEC and is providing the applicable revised RCA ASF renewal forms. These include page 3 facility emissions inventory for which the PTE and actuals have been updated to include the additional PM emissions from the NY Materials screen and the combustion emissions from the exempt onboard engine, page 12 for the updated emissions unit description to reflect two (2) screens, page 13 to add SCR3 to the process description and to update the PM process emissions summary, and the continuation page to include the additional screen (SCR3) as an emission source. Note, the facility is already authorized to process RAP and the onboard engine is exempt, and no additional processes are required for the permit.

The Permittee is looking for clarification on two (2) matters from DEC:

- 1) Is any further action required at this time for the renewal request for the NY Materials AFR, or is it understood that the Advanced Notification was sufficient, and that the screen will ultimately be incorporated in the RCA ASF?**
- 2) As disclosed in our previous communications and the Advanced Notification, the Permittee intends to move the existing crusher and screen from 7 Edison Avenue to 29 Edison Avenue. I don't think we necessarily require permission from DEC to do so, but we would appreciate acknowledgment of this plan from DEC for the purpose of maintaining a common understanding of site operations and configuration.**

Beyond these two items, the Permittee is content to remain patient and will address any additional requests from DEC on the RCA ASF renewal, as they arise.

Thank you for your consideration. I look forward to hearing from you soon.

Have a great weekend,

David

JMT of New York, Inc.
An Employee-Owned Company

David T. Straw
Associate
Special Projects
(518) 782-0882

From: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Sent: Wednesday, July 24, 2024 3:26 PM

To: Straw, David <DStraw@jmt.com>
Cc: Carroll, Alexandra <ACarroll@jmt.com>
Subject: [EXTERNAL] RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

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David,

Sorry for the delay. I am confirming a few things with our Central Office before we proceed. However, I know we will need an updated permit application for RCA Asphalt to include the items from NY Materials. I'm will to accept a submittal of just the pages of the application impacted by the new items from NY Materials. This can include the pages of the permit application pertaining to the PTE emissions, emission units, emission sources, and processes.

Andrew Chin

From: Straw, David <DStraw@jmt.com>
Sent: Tuesday, July 23, 2024 1:50 PM
To: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Cc: Carroll, Alexandra <ACarroll@jmt.com>
Subject: RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

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Hi Andrew,

Just following up on this. RCA is eager to move the crusher. I'm not sure we need permission from DEC to do so, but we are committed to a cooperative working relationship with the DEC so we would appreciate some clarification from DEC if the Advanced Notification is sufficient at this time.

Let me know if you have any questions or would like to discuss this further.

David

JMT of New York, Inc.
An Employee-Owned Company

David T. Straw, GIT
Associate
Special Projects
(518) 782-0882

From: Straw, David <DStraw@jmt.com>
Sent: Wednesday, July 17, 2024 4:44 PM
To: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Cc: Carroll, Alexandra <ACarroll@jmt.com>
Subject: RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

Hi Andrew,

Yes, we will ultimately include the NY Materials emission sources (i.e., screen and conveyors) in a revised ASF renewal submittal for RCA. DEC has not yet acted on the RCA ASF renewal application submitted last August, and

this is likely due to the uncertainty surrounding the repeal and replacement of Part 212 with Part 220. My thought was that once Part 220 is formally adopted, DEC would issue a NOIA for the RCA ASF renewal application and include a request to add the NY Materials emission sources in the revised renewal application materials. If the DEC seeks to require a CLCPA, that request could be included in the NOIA as well. Alternatively, If DEC requires additional information or submittals prior to the adoption of Part 220, please clarify what specifically is requested in a NOIA or detailed email.

Also, can you confirm if the Advanced Notification satisfies the DEC's request for a renewal application for the NY Materials AFR, or will other documentation in addition to the revised ASF renewal application be required?

Ultimately, given that DEC has not formally acted on the renewal application for the RCA ASF, we just need a clear understanding of how DEC is proposing to proceed, including the timing of any additional submittals that may be requested.

Let me know if you would like to set up a call to discuss this.

Thank you,

JMT of New York, Inc.
An Employee-Owned Company

David T. Straw, GIT
Associate
Special Projects
(518) 782-0882

From: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Sent: Wednesday, July 17, 2024 2:49 PM
To: Straw, David <DStraw@jmt.com>
Cc: Carroll, Alexandra <ACarroll@jmt.com>
Subject: [EXTERNAL] RE: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

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David,

Thanks for the notification. It does appear that my boss is okay with this change since the whole contiguous property is under the same ownership. Will you be submitting a new permit renewal application to include the emission sources from NY Materials as well? We may also have to address CLCPA as well. Once we get the permit issued I can expire the registration for NY Materials since it will be covered under the RCA Asphalt permit.

Andrew Chin

From: Straw, David <DStraw@jmt.com>
Sent: Monday, July 8, 2024 9:56 AM
To: Chin, Andrew P (DEC) <Andrew.Chin@dec.ny.gov>
Cc: Carroll, Alexandra <ACarroll@jmt.com>
Subject: FW: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

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Hi Andrew,

I hope you had a pleasant holiday weekend. Please let me know if you have any questions regarding the attached Advanced Notification submitted last Wednesday.

Thank you,
David

JMT of New York, Inc.
An Employee-Owned Company

David T. Straw, GIT
Associate
Special Projects
(518) 782-0882

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Thank You.

From: Carroll, Alexandra <ACarroll@jmt.com>
Sent: Wednesday, July 3, 2024 1:30 PM
To: Andrew.Chin@dec.ny.gov
Cc: Straw, David <DStraw@jmt.com>; expresscharlie@aol.com; Dario Amicucci <dario@cofireasphalt.com>; Alita Giuda <agiuda@couchwhite.com>
Subject: Advanced Notification for RCA Asphalt, LLC – Mount Vernon Plant; DEC ID: 3-5508-00133/00005

Good Afternoon,

On behalf of David Straw, please find the attached Advanced Notification for the above referenced facility. We trust that the attached adequately satisfies the Department's Air Facility Registration (AFR) renewal request, dated June 4, 2024 for the NY Materials, LLC facility (DEC ID: 3550801135). If you would kindly respond to this email as a means of acknowledgement, it would be greatly appreciated.

Please do not hesitate to reach out to David directly if you should have any questions or need additional information.

Thank you,
Alexandra

JMT of New York, Inc.
An Employee-Owned Company

Alexandra Carroll, GISP
Senior Associate
Special Projects

19 British American Boulevard
Latham, New York 12110
D. (518) 218-5925
acarroll@jmt.com

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