



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
MIAMI COUNTY
Application No: 08-03394

DATE: 3/1/2001

Barrett Paving Materials Plt 138
James Meckstroth
P.O. Box 13591 2551 Needmore Rd
Dayton, OH 454130591

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 500 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 08-03394

Application Number: **08-03394**
APS Premise Number: **0855140230**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **Barrett Paving Materials Plt 138**
Person to Contact: **James Meckstroth**
Address: **P.O. Box 13591 2551 Needmore Rd
Dayton, OH 454130591**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**803 S Union St
Troy, OHIO**

Description of modification:
asphaltic concrete batch plant 138, administrative modification due to change of control equipment, i.e. scrubber to baghouse.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Barrett Paving Materials Plt 138

Facility ID: **0855140230**

PTI Application: 08-03394

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Barrett Paving Materials Plt 138** located in **MIAMI** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P901	Asphaltic Concrete Batch Plant #138 *Modification	**	3745-31-05 3745-17-07 3745-17-08 3745-17-11	60.51 lbs/hr 37.81 TPY Particulate; .46 lb/hr .29 TPY Lead; 21.12 lbs/hr 13.20 TPY SO ₂ ; 3.6 lbs/hr 2.25 TPY OC; 28.80 lbs/hr 18.0 TPY NO _x ; 96.0 lbs/hr 60.0 TPY CO; 0.10 lb/hr 0.06 TPY HCl 20% visible emission opacity

* This modification represents the incorporation of the new AP-42 emission factor and the change in control equipment from a scrubber to a baghouse. The allowable emission increases (+) and decreases (-) are as follows: (+) 0.28 TPY Pb; (-) 22.8 TPY SO₂; (-) 4.65 TPY OC; (-) 7.5 TPY NO_x; (+) 9.0 TPY CO.

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- ** Compliance with the applicable OAC rules and specified allowable emission rates through the application of a baghouse as primary control; compliance with the used oil specifications; PM & MAP; recordkeeping and reporting.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate	37.81
Lead	0.29
Sulfur Dioxide	13.20
Organic Compounds	2.25
Nitrogen Oxide	18.0
Carbon Monoxide	60.0
Hydrogen Chloride	0.06

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Equipment

1. The specific equipment which comprises this source is listed in the following table along with the applicable rules of the Ohio Administrative Code (OAC):

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<u>Equipment</u>	<u>Type of Emissions</u>	<u>Applicable Rules</u>
rotary dryer, hot aggregate elevator, vibrating screens, and weigh hopper	process (stack)	3745-17-07; Best Available Technology (pursuant to OAC rule 3745-31-05)
aggregate storage bins and cold aggregate elevator	fugitive	Best Available Technology; 3745-17-08

(This condition in no way limits the applicability of other requirements of the OAC to this source.)

Allowable Emissions/Control Requirements

2. The allowable mass emission limitation and control requirements for the equipment identified above are specified in the following table:

<u>Equipment</u>	<u>Allowable Mass Emission Limitation and Control Requirements</u>
rotary dryer, hot aggregate elevator, vibrating screens, and weigh hopper	shall not exhibit 20% or greater visible emissions 60.51 lbs/hr 37.81 tons/yr particulate; .46 lb/hr .29 ton/yr lead; 21.12 lbs/hr 13.20 tons/yr SO ₂ ; 3.6 lbs/hr 2.25 tons/yr OC; 22.8 lbs/hr 18.0 tons/yr NO _x ; 96.0 lbs/hr

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60.0 tons/yr CO;

0.10 lb/hr

0.06 ton/yr HCl

no visible emissions of fugitive dust from the enclosures for the hot aggregate elevator, vibrating screens, and weigh hopper

aggregate storage bins the drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the elevator loading area

cold aggregate elevator the aggregate loaded into the storage bins shall have a moisture content sufficient to eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer

In accordance with Ohio Administrative Code (OAC) rule 3745-31-05(A)(2), this facility shall comply with all applicable laws as defined in OAC rule 3745-31-01(F). Therefore, this air permit to install cannot exempt the facility from any current or future regulations regarding the disposal or recycling of used oil.

Operations Requirements

- To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 2.5 inches or greater than 5.0 inches all be maintained at all times.

Used Oil Specifications

- All recycled used oil burned at the facility shall meet the following specifications:

<u>Contaminant/Property</u>	<u>Permit Allowable Concentrations*</u>
Arsenic	5 ppm, maximum
Cadmium	2 ppm, maximum
Chromium	10 ppm, maximum

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Lead	100 ppm, maximum
PCB's	50 ppm, maximum
Total Halogens	4000 ppm, maximum
Mercury	1 ppm, maximum
Flash Point	140° F, minimum
Heat Content	135,000 Btu/gallon, minimum

* Some or all of these used oil specifications exceed the Resource Conservation & Recovery Act Standards of 40 CFR Part 266.40 and OAC Rule 3745-58-50, thereby, making the used oil off-specification.

5. The used oil shall not corrode steel at a rate greater than one fourth of an inch per year at a temperature of 55° C (130° F).
6. This source may not receive or burn any used oil which does not meet the specifications listed above. An exceedance would be considered a violation of Ohio Administrative Code 3745-31-02.
7. Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 266.40 (c) and OAC rule 3745-58-50. Therefore, this facility may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 5000 ppm, maximum) only if the supplier {'marketer' in 40 CFR 266.43(a)] has demonstrated to Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

Analytical Requirements for Each Shipment of Used Oil

8. This facility shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's U.S. EPA identification number, and the following information:
 - a. date of shipment or delivery;
 - b. quantity of used oil received;
 - c. the Btu value of the used oil;
 - d. the flash point of the used oil;
 - e. the arsenic content;
 - f. the cadmium content;
 - g. the chromium content;
 - h. the lead content;
 - i. the PCB content;
 - j. the total halogen content; and,
 - k. the mercury content

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Each analysis shall be kept for a minimum of five (5) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

Baghouse Monitoring and Recordkeeping Requirements

9. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the fabric filter.
10. The permittee shall check the pressure drop once a day and maintain daily records of the pressure drop readings.

Baghouse Reporting Requirements

11. The permittee shall submit deviation (excursion) reports which identify all exceedances of the above-mentioned allowable pressure drop range.

Reporting Requirements for Used Oil Burned in the Dryer

12. The permittee shall notify the U.S. EPA and the Ohio EPA if any of the used oil exceeds the used oil specifications. An identification number from U.S. EPA shall be obtained prior to the combustion of any used oil.

Used Oil On-Site Sampling/Analytical Requirements

13. This facility shall sample each incoming shipment of used oil. The sampling frequency for used oil shall be one (1) properly labeled 500 ml sample for each truck or container delivery. The sample shall be taken and retained for at least sixty (60) days.

RAPCA and Ohio EPA may require and/or conduct periodic, detailed chemical analyses through an independent laboratory of any used oil received at this facility; of any sample retained, as required above; and of any storage tanks at this facility.

Additionally, this facility shall provide a plan for documenting that the used oil does not contain any hazardous waste as specified under 40 CFR Parts 261 and 279.

Preventative Maintenance & Malfunction Abatement Plan (PM&MAP)

14. The owner and/or operator of this facility shall implement a PM&MAP for this source and associated emission control system(s).

The PM&MAP shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of this emission unit P901, and its associated air pollution control equipment. The PM&MAP shall be in writing and shall be submitted to the Regional Air Pollution Control Agency in conjunction with the subsequent permit to operate application.

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Recycled Asphalt Production

15. The emission unit P901 has been approved for the use of recycled asphalt products.

Production Limitations

16. The emission unit P901 is rated at a maximum of 240 tons per hour of asphaltic concrete production.
17. The emission unit P901 shall be limited to 300,000 tons of asphalt production per year. In order to ensure federal enforceability for the first twelve months of operation after the issuance of this permit, Barrett Paving shall not exceed the following production limits:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production (Tons)</u>
1-6	150,000
7	175,000
8	200,000
9	225,000
10	250,000
11	275,000
12	300,000

After the first 12 months of operation, emission unit P901 shall be limited to 300,000 tons of asphalt production per rolling 12 month period (i.e., from February to February, March to March, etc.).

Recordkeeping/Reporting

18. This facility shall maintain monthly records of:
- the asphaltic concrete production (tons);
 - the amount (gallons) of used oil received;
 - the amount (gallons) of used oil burned; and,
 - the chemical analysis received for each shipment of used oil.
19. This facility shall submit annual reports to the Regional Air Pollution Control Agency which include the data specified above. These reports shall be due by January 15 of each year, and shall cover the previous twelve calendar months.

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20. This facility shall notify the Regional Air Pollution Control Agency of any exceedance of the rolling 12 month limitation or the first twelve months limitations expressed in term and condition number 17 of this permit. Such notification shall be sent to RAPCA within 30 days after the exceedance occurs.
21. Within 12 months of the issuance of this permit, this source shall conduct, or have conducted, performance testing on the air contaminant emission unit in accordance with procedures approved by the Agency. A copy of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the emission unit's operation and testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.
 - a. A completed Intent to Test form shall be submitted to the Regional Air Pollution Control Agency. This notice shall be made 30 days in advance and shall specify the emission unit's operating parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.
 - b. A copy of the test results shall be submitted within 30 days after the completion of the performance test.

Specifically, this emission unit shall be performance tested to demonstrate compliance with the particulate matter, lead and hydrogen chloride allowable emission rates stated in this permit.