State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MONTGOMERY COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 08-04627
Fac ID: 0857983257
DATE: 9/30/2004

Barrett Asphalt Mat Inc.-AG8 B
Jim Mechstroth
PO Box 13591
Dayton, OH 454310591

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 9/30/2004**
Terms and Conditions **Effective Date: 9/30/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04627

Application Number:	08-04627
Facility ID:	0857983257
Permit Fee:	**$100**
Name of Facility:	Barrett Asphalt Mat Inc.-AG8 B
Person to Contact:	Jim Mechstroth
Address:	PO Box 13591 Dayton, OH 454310591

Location of proposed air contaminant source(s) [emissions unit(s)]:
PO Box 13591
Dayton, **Ohio**

Description of proposed emissions unit(s):
portable transfer administrative modification to change facility number and emissions unit number due to SEDO transfer to RAPCA 06-07172 issued 8/12/03.

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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the

permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
SO2	0.6
NOx	6.9
VOC	0.7
PE	0.4
CO	1.6

Emissions Unit ID: **P001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
	OAC rule 3745-17-11(B)(5)(a)
	OAC rule 3745-17-07(A)(1)
P001 - Portable 200 HP Diesel Generator, Equipment No. AG8-B	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-18-06(B)
	OAC rule 3745-23-06(B)
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V permitting)

Applicable Emissions Limitations/Control Measures	
Emissions shall not exceed: 0.5 pounds per hour (lb/hr) of sulfur dioxide (SO2); 6.2 lb/hr of nitrogen oxides (NOx); 0.6 lb/hr of volatile organic compounds (VOC); and 1.4 lb/hr of carbon monoxide (CO). The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-17-11(B)(5)(a) and 3745-17-07(A). Emissions shall not exceed, as a 12 month rolling summation: 0.6 tons SO2 6.9 tons NOx 0.7 tons VOC 0.4 tons particulate emissions (PE) 1.6 tons CO See Section B.2. below. 0.310 lb PE/million Btu of actual heat input. Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule See Section A.2.a. below.	See Section A.2.b. below.

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

2.b The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

B. Operational Restrictions

1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.

2. The permittee has requested a federally enforceable limitation on operating hours for purposes of limiting potential to emit to avoid possible future Title V applicability associated with relocation of a portable source. Therefore, the maximum number of operating hours for emissions unit P001 shall not exceed 2,205 hours based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Month(s)	Maximum Cumulative Operating Hours
1	280
1-2	560
1-3	840
1-4	1,120
1-5	1,400
1-6	1,680
1-7	1,960
1-8	2,205
1-9	2,205

1-10	2,205
1-11	2,205
1-12	2,205

After the first 12 calendar months of operation following the startup of emissions unit P001, compliance with the annual operating hours limitation shall be based upon a rolling 12-month summation of the operating hours.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain documentation on the sulfur content of all fuels received.

2. For each day during which the permittee burns a fuel other than low sulfur No. 2 or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

3. The permittee shall maintain monthly records of the following information:

   a. The hours of operation for P001 for each month.

   b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit.

   c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than low sulfur No. 2 or diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

   a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

b. Any exceedance of the rolling 12-month hours of operation limitation.

c. Any exceedance of the sulfur content fuel restriction specified in Section B.1.

These deviation (excursion) reports shall be submitted in accordance with Section A.2. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Emissions Limitation:
Emissions of SO2 shall not exceed 0.5 lbs/hour and 0.6 tons per twelve month rolling summation.

Applicable Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.00205 lb/HP-hr) by the maximum rated capacity of P001 (200 HP).

Annual emissions shall be determined by multiplying the hourly SO2 emission rate by the total number of hours operated per twelve month rolling period and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency .

2. Emission Limitation:
Emissions of NOx shall not exceed 6.2 lb/hr and 6.9 tons per twelve month rolling summation.

Applicable Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emissions factor from AP-42, Table 3.3-1, 10/1996 (0.031 lb/HP-hr) by the maximum rated capacity of P001 (200 HP).

Annual emissions shall be determined by multiplying the hourly NOx emission rate by the total number of hours operated per twelve month rolling period and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 7. Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency .

3. Emission Limitation:
Emissions of VOC shall not exceed 0.6 lbs/hour and 0.7 tons per twelve month rolling

summation.

Applicable Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.00251 lb/HP-hr) by the maximum rated capacity of P001 (200 HP).

Annual emissions shall be determined by multiplying the hourly VOC emission rate by the total number of hours operated per twelve month rolling period and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency .

4. Emission Limitation:
Particulate emissions shall not exceed 0.4 tons per twelve month rolling summation.

Applicable Compliance Method:
Compliance shall be determined by multiplying the PE emission limitation of 0.310 lb/mmBtu of actual heat input by the maximum heat input of P001 (1.02 mmBtu/hr) and by the total number of hours operated per twelve month rolling period and dividing by 2000 lbs/ton.

5. Emissions Limitation:
Emissions of carbon monoxide (CO) shall not exceed 1.4 lbs/hr and 1.6 tons per twelve month rolling summation.

Applicable Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emissions factor from AP-42, Table 3.3-1, 10/1996 (0.00668 lb/HP-hr) by the maximum rated capacity of P001 (200 HP).

Annual emissions shall be determined by multiplying the hourly CO emission rate by the total number of hours operated per twelve month rolling period and dividing by 2000 lbs/ton.

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Regional Air Pollution Control Agency .

6. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as

provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

7. Emission Limitation:
Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input.

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.31 lb/mmBtu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

8. Operational Limitation:
Sulfur content of fuel restricted to less than 0.5%, by weight

Applicable Compliance Method:
Compliance shall be based on recordkeeping as specified in Section C.1. of this permit.

9. Operational Limitation:
Maximum of 2,205 hours of operation based upon a rolling 12-month summation

Applicable Compliance Method:
Compliance shall be based on recordkeeping as specified in Section C.3. of this permit.

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

   a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;

   b. The portable emissions unit is operating pursuant to a currently effective permit to install, permit to operate or registration;

c. The applicant has provided proper notice of intent to relocate the portable emissions unit to the Regional Air Pollution Control Agency (RAPCA) and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,

d. In the RAPCA's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

a. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;

b. The portable emissions unit is equipped with best available technology;

c. The portable emission unit owner has identified the proposed site to Ohio EPA;

d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

e. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;

f. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,

g. The portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to this section, shall be valid for no longer than three years and are subject to renewal.

3. In order for the RAPCA and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the RAPCA (117 South Main Street, Dayton, Ohio 45422) and the appropriate office having jurisdiction over the new site.

Upon receipt of the notice, the RAPCA and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

4. The permittee should be advised that when portable emission units are located at a stationary source or at a source comprised of portable emission units, potential emissions from the portable emission units are included in the facility potential to emit calculations for Title V and PSD applicability.

   The permittee shall include a potential to emit analysis of facility-wide emissions (including the portable sources) for the proposed relocation in the "Notice of Intent to Relocate".

5. The terms and conditions of PTI 08-0427 will supercede those in PTI 06-07172 issued on 8/12/03. This portable generator was previously owned by Allied Corporation in SEDO's jurisdiction. With the purchase of this plant by Barrett Asphalt Materials in RAPCA's jurisdiction, the plant will be transferred through this administrative PTI modification.