



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  
HAMILTON COUNTY  
Application No: 14-04752  
Fac ID: 1431081271**

**CERTIFIED MAIL**

**DATE:** 5/9/2006

Barrett Paving Materials Inc  
Daniel Gennaro  
7374 Main St  
Cincinnati, OH 452443015

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 **\$ 625** 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.

Sincerely,

*Michael W. Ahern*

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

CC: USEPA HCDES Ohio-Kentucky-Indiana Reg Council of Governments KY IN

**HAMILTON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-04752 FOR AN AIR CONTAMINANT SOURCE FOR  
Barrett Paving Materials Inc**

On 5/9/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Barrett Paving Materials Inc**, located at **9550 Valley Junction Rd, Cleves, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-04752:

**asphalt concrete plant - rotary dryer, hot aggregate elevator, vibrating screen and weigh hopper.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**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 14-04752**

Application Number: 14-04752  
Facility ID: 1431081271  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Barrett Paving Materials Inc  
Person to Contact: Daniel Gennaro  
Address: 7374 Main St  
Cincinnati, OH 452443015

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**9550 Valley Junction Rd  
Cleves, Ohio**

Description of proposed emissions unit(s):  
**Asphalt concrete plant - rotary dryer, hot aggregate elevator, vibrating screen and weigh hopper.**

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

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Director

**Barrett Paving Materials Inc**

**Facility ID: 1431081271**

**PTI Application: 14-04752**

**Issued: To be entered upon final issuance**

**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 record keeping 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 record keeping 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,

**Barrett Paving Materials Inc**

**Facility ID: 1431081271**

**PTI Application: 14-04752**

**Issued: To be entered upon final issuance**

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

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	10.68
PM10	6.96
SO <sub>2</sub>	21.78
NO <sub>x</sub>	29.70
OC	7.76
CO	99.62

Barrett Paving Materials Inc  
PTI A  
Issue

Facility ID: 1431081271

Emissions Unit ID: P901

**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

P901 - 270 tons per hour (TPH)  
portable asphalt batch plant  
controlled with a fabric filter -  
Modified

OAC rule 3745-31-05(A)(3)

Barrett Paving Materials Inc  
PTI A  
Issue

Facility ID: 1431081271

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OAC rule 3745-35-07(B)(1)  
Synthetic Minor to Avoid Title V  
Requirements

OAC rule 3745-17-08(B)

OAC rule 3745-18-06(E)

OAC rule 3745-21-08(B)

OAC rule 3745-23-06(B)

OAC rule 3745-17-07(A)(1)

OAC rule 3745-17-11(B)

OAC rule 3745-17-07(B)

40 CFR Part 60, Subpart I

**Barre****PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**Applicable Emissions  
Limitations/Control Measures

When burning natural gas, No. 2 fuel oil or used oil in the drum dryer burner:

Particulate emissions (PE) shall not exceed 11.34 lbs/hr.

Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 7.29 lbs/hr.

Volatile organic compound (VOC) emissions shall not exceed 4.05 lbs/hr.

Carbon monoxide (CO) emissions shall not exceed 108.0 lbs/hr.

When using natural gas in the drum dryer burner:

Nitrogen oxides (NOx) emissions shall not exceed 6.75 lbs/hr.

Sulfur dioxide (SO2) emissions shall not exceed 1.24 lbs/hr.

When using No. 2 fuel oil or used oil in the drum dryer burner:

NOx emissions shall not exceed 32.4 lbs/hr.

SO2 emissions shall not exceed 23.76 lbs/hr.

PE/PM10 from plant load-out shall not exceed 0.14 lb/hr.

VOC emissions from plant load-out shall not exceed 1.12 lbs/hr.

CO emissions from plant load-out shall not exceed 0.36 lb/hr.

PE/PM10 from silo filling shall not exceed 0.16 lb/hr.

VOC emissions from silo filling shall not exceed 3.29 lbs/hr.

CO emissions from silo filling shall not exceed 0.32 lb/hr.

See terms A.2.a, A.2.d, A.2.e, B.4 and B.5.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart I, OAC rule 3745-35-07(B)(1), OAC rule 3745-17-07(B), OAC rule 3745-21-08(B) and OAC rule 3745-23-06(B).

The PE shall not exceed 0.04 grain particulate matter/dscf.

See term A.2.b.

Total allowable emissions from this emissions unit shall not exceed the following based on rolling, 12-month summation:

PE shall not exceed 10.68 TPY.

PM10 shall not exceed 6.96 TPY.

CO emissions shall not exceed 99.62 TPY.

NOx emissions shall not exceed 29.7 TPY.

SO2 emissions shall not exceed 21.78 TPY.

VOC emissions shall not exceed 7.76 TPY.

See term B.3

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart I.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See term A.2.c.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See term A.2.f.

See term A.2.g.

## **2. Additional Terms and Conditions**

- 2.a** All used oil burned in emissions unit P901 shall be "on-specification" (on-spec) oil and meet the following specifications:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	10 ppm, maximum*
total halogens	4000 ppm maximum**
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum

\*If the permittee is burning used oil with any quantifiable level (2 ppm) of PCB's, then the permittee is subject to the notification requirements of 40 CFR 279.62.

\*\*Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC chapter 3745-279. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000

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ppm, maximum) only if the supplier ["marketer" in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA's Division of Solid and Hazardous Waste Management that the used oil does not contain any hazardous waste.

- 2.b** The permittee shall not discharge or cause the discharge into the atmosphere from any affected facility any gases which exhibit 20% opacity or greater, as a 6-minute average, except as specified in 40 CFR Part 60, Subpart I.
- 2.c** Visible particulate emissions from any fugitive dust emissions point associated with emissions unit P901 shall not exceed 20% opacity, as a 3-minute average.
- 2.d** 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 cold feed bins and recycled material (RAP) bin.
- 2.e** The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize or eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(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.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.g** 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 Permit to Install 14-05697.

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation

**Emissions Unit ID: P901**

Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.h** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.i** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the rolling, 12-month emission limitations, compliance with the rolling, 12-month production limitations, and the use of a fabric filter to control emissions from the dryer.
- 2.j** The lbs/hr of CO, NO<sub>x</sub>, SO<sub>2</sub> and VOC emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

## **B. Operational Restrictions**

- 1.** To ensure the fabric filter is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, the pressure drop across the fabric filter shall be maintained within the range of 2.0 to 5.0 inches of water while the emissions unit is in operation.
- 2.** The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the process employing the used oil as fuel, or 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.

The facility shall notify the USEPA and the Ohio EPA if the used oil being burned exceeds used oil specifications. Before this facility accepts the first shipment of off-specification used oil from a marketer, this facility must provide the marketer a one-time written and signed notice certifying that:

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- a. The facility has notified USEPA of its used oil management activities and the notice included the location and description of those activities; and
- b. The facility will burn the used oil only in an industrial furnace or boiler identified in accordance with 40 CFR Part 279.

A copy of each certification notice that this facility sends to a marketer must be kept on file for a minimum of 5 years from the date it last received off-specification used oil from that marketer. The facility shall also submit a copy of each certification notice to the Hamilton County Department of Environmental Services.

3. The maximum annual asphalt production rate for emissions unit P901 shall not exceed 495,000 tons per year based upon a rolling, 12-month summation of the production rates. Since this is an existing source it has existing records and therefore does not need to be limited to first year monthly amounts of production.
4. The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials.
5. All number 2 and on-spec used oil burned in this emissions unit shall have a sulfur content equal to or less than 0.5%, by weight.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per shift basis.
2. The permittee 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 USEPA identification number, and the following information:
  - a. the date of shipment or delivery;
  - b. the quantity of used oil received;
  - c. the Btu value of the used oil, in Btu/gallon;

- d. the flash point of the used oil in degrees F;
- e. the arsenic content, in ppm;
- f. the cadmium content, in ppm;
- g. the chromium content, in ppm;
- h. the lead content, in ppm;
- i. the PCB content, in ppm;
- j. the total halogen content, in ppm;
- k. the mercury content, in ppm; and
- l. the sulfur content (%).

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the dryer.

- 3. The permittee shall maintain monthly records of the following information for emissions unit P901:
  - a. The total asphalt production, in tons for each month;
  - b. The rolling, 12-month summation of asphalt production calculated by adding the current month's asphalt production to the asphalt production for the preceding eleven calendar months; and
  - c. The maximum percentage RAP used for any mix.
- 4. For each shipment of fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.

**Barre****PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance****D. Reporting Requirements**

1. The permittee shall furnish the Administrator written notification as follows:

A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify each daily record in which the pressure drop across the baghouse did not comply with the allowable range specified in term B.1. The deviation report shall include a copy of such record.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

3. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the used oil specifications found in OAC rule 3745-279-11 and/or term A.2.a. If the permittee is burning used oil which exceeds the specifications found in OAC rule 3745-279-11, the permittee is subject to that rule and must comply with all provisions of that rule. The required notification shall be submitted within 30 days of the date in which the exceedance occurred.

4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all exceedances of the rolling, 12 month asphalt production limitation specified in term B.3.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the RAP content limit specified in term B.4.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

6. The permittee shall submit quarterly deviation reports that identify all exceedances of the sulfur content limit specified in term B.5.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

7. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

- i. The portable source is equipped with the best available technology for such portable source;
- ii. The portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;
- iii. The applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
- iv. In the judgement of the Ohio EPA District Office or local air agency having

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jurisdiction over the new site, the proposed site is acceptable under OAC rule 3745-15-07.

- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
- i. The portable source permittee possesses an Ohio EPA PTI, PTO or registration status;
  - ii. The portable source is equipped with best available technology;
  - iii. The portable source owner has identified the proposed site to Ohio EPA;
  - iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;
  - v. A public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
  - vi. The owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and
  - vii. The portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the permitting Ohio EPA District Office or local air agency and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office

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or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

8. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month total PE, SO<sub>2</sub>, NO<sub>x</sub>, VOC and CO emission limitations.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

**E. Testing Requirements**

1. Emission Limitations:

The PE shall not exceed 11.34 lbs/hr.

The PE shall not exceed 0.04 grain particulate matter/dscf.

The PM<sub>10</sub> emissions shall not exceed 7.29 lbs/hr.

The VOC emissions shall not exceed 4.05 lbs/hr.

The CO emissions shall not exceed 108.0 lbs/hr.

The NO<sub>x</sub> emissions shall not exceed 6.75 lbs/hr (natural gas) or 32.4 lbs/hr (No. 2 or used oil).

The SO<sub>2</sub> emissions shall not exceed 1.24 lbs/hr (natural gas) or 23.76 lbs/hr (No. 2 or used oil).

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit

in accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days after issuance of the permit to install modification;
- b. The emission testing shall be conducted to demonstrate compliance with the allowable PE, CO, NO<sub>x</sub>, SO<sub>2</sub> and VOC emissions rates;
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for PE emissions, Method 5 of 40 CFR Part 60, Appendix A;  
for PM<sub>10</sub> emissions, Methods 201 and 202 of 40 CFR Part 51, Appendix M;  
for CO emissions, Method 10 of 40 CFR Part 60, Appendix A;  
for NO<sub>x</sub> emissions, Method 7 of 40 CFR Part 60, Appendix A;  
for SO<sub>2</sub> emissions, Method 6 of 40 CFR Part 60, Appendix A; and  
for VOC emissions, Method 25 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA or Hamilton County Department of Environmental Services;  
and

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA or Hamilton County Department of Environmental Services;

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

**2. Emission Limitations:**

The PE/PM10 from plant load-out shall not exceed 0.14 lb/hr.

The VOC emissions from plant load-out shall not exceed 1.12 lbs/hr.

The CO emissions from plant load-out shall not exceed 0.36 lb/hr.

Applicable Compliance Method:

Compliance with the plant load-out emissions limitations shall be demonstrated by applying the emission factors from AP-42, Fifth Edition, Table 11.1-14, 3/2004 in the following equation for each pollutant:

- a. Actual asphalt production rate (tons asphalt/hr) x AP-42 emission factor (lb pollutant/ton asphalt) = lb pollutant/hr

where:

PE emission factor is  $0.000181 + 0.00141(-V)e^{((0.0251)(T+460)-20.43)}$ ;

VOC emission factor is  $0.0172(-V)e^{((0.0251)(T+460)-20.43)}$ ;

CO emission factor is  $0.0058(-V)e^{((0.0251)(T+460)-20.43)}$ ;

V = site-specific asphalt volatility (percent loss-on-heating) or default value of -0.5; and

T = site-specific asphalt mix temperature, °F or default value of 325 °F.

**3. Emission Limitations:**

The PE/PM10 emissions from silo filling shall not exceed 0.16 lb/hr.

The VOC emissions from silo filling shall not exceed 3.29 lbs/hr.

The CO emissions from silo filling shall not exceed 0.32 lb/hr.

Applicable Compliance Method:

Compliance with the silo filling emission limitations shall be demonstrated by applying the emission factors from AP-42, Fifth Edition, Table 11.1-14, 3/2004 in the following equation for each pollutant:

- a. Actual asphalt production rate (tons asphalt/hr) x AP-42 emission factor (lb pollutant/ton asphalt) = lb pollutant/hr

where:

PE emission factor is  $0.000332 + 0.00105(-V)e^{((0.0251)(T+460)-20.43)}$ ;

VOC emission factor is  $0.0504(-V)e^{((0.0251)(T+460)-20.43)}$ ;

CO emission factor is  $0.00488(-V)e^{((0.0251)(T+460)-20.43)}$ ;

V = site-specific asphalt volatility (percent loss-on-heating) or default value of -0.5; and

T = site-specific asphalt mix temperature, °F or default value of 325 °F.

#### 4. Emission Limitations:

Allowable emissions shall not exceed the following based on rolling, 12-month summations:

The PE shall not exceed 10.68 TPY.

The PM10 emissions shall not exceed 6.96 TPY.

The CO emissions shall not exceed 99.62 TPY.

The NOx emissions shall not exceed 29.7 TPY.

The SO2 emissions shall not exceed 21.78 TPY.

The VOC emissions shall not exceed 7.76 TPY.

Applicable Compliance Method:

Compliance with the rolling, 12-month summations shall be demonstrated by a summation using the following equations:

- a. Actual asphalt production using any fuel type in the dryer (tons asphalt/year, rolling, 12-month summation) x pollutant emission factor (lb pollutant/ton asphalt) x 1 ton/2000 lbs = TPY, rolling, 12 month summation

where:

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PE emission factor is 0.042 lb/ton, based on AP-42, Fifth Edition, Table 11.1-1, 3/2004;

PM10 emission factor is 0.027 lb/ton, based on AP-42, Fifth Edition, Table 11.1-1, 3/2004;

CO emission factor is 0.4 lb/ton, based on AP-42, Fifth Edition, Table 11.1-5, 3/2004; and

VOC emission factor is 0.015 lb/ton, based on AP-42, Fifth Edition, Table 11.1-6, 3/2004.

- b. Actual asphalt production using natural gas in the drum dryer burner (tons asphalt/year, rolling, 12-month summation) x pollutant emission factor (lb pollutant/ton asphalt) x 1 ton/2000 lbs = TPY, rolling, 12 month summation

where:

NOx emission factor is 0.025 lb/ton, based on AP-42, Fifth Edition, Table 11.1-5, 3/2004; and

SO2 emission factor is 0.0046 lb/ton, based on AP-42, Fifth Edition, Table 11.1-5, 3/2004.

- c. Actual asphalt production using No. 2 oil or used oil in the drum dryer burner (tons asphalt/year, rolling, 12-month summation) x pollutant emission factor (lb pollutant/ton asphalt) x 1 ton/2000 lbs = TPY, rolling, 12 month summation

where:

NOx emissions factor is 0.12 lb/ton, based on AP-42, Fifth Edition, Table 11.1-5, 3/2004; and

SO2 emissions factor is 0.088 lb/ton, based on AP-42, Fifth Edition, Table 11.1-5, 3/2004.

**5. Emission Limitation:**

Visible particulate emissions from any stack associated with emissions unit P901 shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

In accordance with 40 CFR 60.93(b)(2), compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60

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("Standards of Performance for New Stationary Sources") and the procedures specified in 40 CFR 60.11.

**6. Emission Limitation:**

Visible particulate emissions from any fugitive dust emissions point associated with emissions unit P901 shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the procedures specified in OAC rule 3745-17-03(B)(3).

- 7.** Compliance with the used oil specifications in term A.2.a shall be demonstrated by the record keeping requirements specified in term C.2.
- 8.** Compliance with the annual asphalt production rate limitation in term B.3 shall be demonstrated by the record keeping requirements specified in term C.3.
- 9.** Compliance with the sulfur content limitation in term B.5 shall be demonstrated by the record keeping requirements specified in term C.4.
- 10.** Compliance with the fabric filter operational requirements in term B.1 shall be demonstrated by the record keeping requirements specified in term C.1.

**F. Miscellaneous Requirements**

- 1.** The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install 14-04752 as issued on March 29, 2000.
- 2.** The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.
- 3.** Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply

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for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.