☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **14-05058**

Barrett Paving Materials

A. Source Description:

Barrett Paving Materials Inc. has submitted a permit to install application for a 350 ton per hour drum mix asphalt plant. This equipment is used in the production of asphaltic concrete.

B. Facility Description:

This facility is located in Hamilton County, Ohio and will be a minor facility. Hamilton County is classified as attainment for all pollutants.

C. Source Emissions:

Potential emissions of PM/PM10, SO2, NOx and OC from this emissions unit (including fugitive particulate emissions) are above the threshold to be considered a major facility for Title V purposes. Therefore Barrett Paving Materials Inc. will have a production limit of 875,000 tons per year and is required to use a baghouse for control of particulate matter. Parametric monitoring of the baghouse will be required in order to ensure that the baghouse is operating within the allowable pressure drop range. Compliance with the annual production limit will be based upon a rolling, 12-month summation. This facility will maintain monthly records and submit excursion reports that identify all exceedances of the rolling, 12-month production rate limitation.

D. Conclusion:

With this permit, the federally enforceable terms and conditions will limit the annual asphalt production and require the use of control equipment so that the facility has a potential to emit less than 100 tons per year of PM/PM10, SO2, NOx and OC. Barrett Paving Materials Inc. will not be considered a major facility for the purpose of Title V permitting.

State of Ohio Environmental Protection Agency

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

Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
HAMILTON COUNTY
Application No: 14-05058
DATE: 1/16/2001

Barrett Paving Materials, Inc.
Dan Koeninger
7374 Main Street
Cincinnati, OH 45244

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 may be issued in proposed of 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 a fee of **$1000** 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

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

CC: USEPA **HCDES** **KY** **IN** **OH-KY-IN Reg Coun of Govt**
Kathy Clayton **City of Cincinnati - OEM**

DRAFT PERMIT TO INSTALL 14-05058

Application Number:	14-05058
APS Premise Number:	1431140014
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Barrett Paving Materials, Inc.
Person to Contact:	Dan Koeninger
Address:	7374 Main Street Cincinnati, OH 45244

Location of proposed air contaminant source(s) [emissions unit(s)]:
24 Byrnes Lake Drive
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
350 TPH drum mix asphalt plant.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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 Related to Monitoring and Recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

a. 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 <u>obtained before</u> 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).

b. 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.

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
OC	54.3
PM	26.6
PM-10	17.4
SO2	44.7
NOx	32.8
CO	24.5

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
P902 - 350 TPH drum mix asphalt plant	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V
	40 CFR Part 60 Subpart I

	Applicable Emissions Limitations/Control Measures	
	10.8 lbs PM/hr from stack emissions	include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), 40 CFR Part 60 Subpart I and OAC rule 3745-35-07(B).
OAC rule 3745-17-07(A)	4.3 lbs PM-10/hr from stack emissions	13.5 TPY* PM from stack emissions 5.4 TPY* PM-10 from stack emissions
	10.5 lbs PM/hr from fugitive emissions	13.13 TPY* PM from fugitive emissions
OAC rule 3745-17-07(B)(1)	9.5 lbs PM-10/hr from fugitive emissions	12.0 TPY* PM10 from fugitive emissions
OAC rule 3745-17-08(B)	19.6 lbs CO/hr, 24.5 TPY* CO 26.3 lbs NO_x/hr, 35.8 lbs SO_2/hr, 43.4 lbs OC/hr,	32.8 TPY* NOx 44.7 TPY* SO_2 54.3 TPY* OC
	0.030 lb arsenic/hr 0.038 TPY arsenic* 0.012 lb cadmium/hr 0.015 TPY cadmium* 0.06 lb chromium/hr 0.08 TPY chromium* 0.37 lb lead/hr 0.46 TPY lead* 0.06 lb PCB/hr 0.08 TPY PCB* 0.006 lb Mercury/hr 0.008 TPY Mercury* 0.044 lb HCl/hour 0.056 TPY HCl*	* The TPY emission limitations are based on a rolling, 12-month summation. See term B.3.
	See terms A.2.b, A.2.e and A.2.f	0.04 grain PM per dry standard cubic foot of exhaust gases.
OAC rule 3745-17-11(B)	The requirements of this rule also	The opacity 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). Visible particulate emissions of

fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.

Use of adequate enclosures and sufficient draft to minimize or eliminate visible emissions of fugitive dust from the hot aggregate elevator, vibrating screens, and weigh hopper.

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.

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.

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

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, production limitations, use of a fabric filter and compliance with the Ohio EPA's Air Toxics Policy.

2.b Visible particulate emissions from any stack associated with emissions unit P902 shall not exceed 10% opacity, as a six-minute average, except as provided by rule.

2.c 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.d The hourly emission limitations outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

2.e All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specifications
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	60 ppm, maximum
PCBs	10 ppm, maximum*
total halogens	4000 ppm maximum
mercury	1 ppm, maximum
flash point	100°F, minimum
heat content	135,000 Btu/gallon, minimum
sulfur content	0.35%

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

2.f 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 rule 3745-279. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 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.

B. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within a range of 3 inches of water to 6 inches of water while the emissions unit is in operation.

2. The maximum asphaltic concrete production from this plant shall not exceed 350 tons per hour.

3. The maximum annual asphalt production rate for this emissions unit shall not exceed 875,000 tons per year based upon a rolling, 12-month summation of the production rates.

   To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit P902, the permittee shall not exceed the production levels specified in the following table:

Emissions Unit ID: **P902**

Month(s)	Maximum Allowable Cumulative Production (Tons)
1	72,920
1-2	145,840
1-3	218,760
1-4	291,680
1-5	364,600
1-6	437,520
1-7	510,440
1-8	583,360
1-9	656,280
1-10	729,200
1-11	802,120
1-12	875,000

After the first 12 calendar months of operation following the startup of emissions unit P902, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

4. The use of recycled asphalt product (RAP) shall be limited to 50 percent for surface, base, and intermediate mixes.

5. The permittee may not receive or burn any used oil which does not meet the specifications listed in this permit without first obtaining a permit to install that authorizes the burning of such used oil.

6. The permittee may not receive or burn any #2 fuel oil and/or used oil which has a sulfur content greater than 0.35 percent.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 baghouse once per shift.

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. Date of shipment or delivery,
b. Quantity of used oil received (gallons),
c. The Btu value of the used oil (Btu/gallon),
d. The flash point of the used oil (°F),
e. The arsenic content (ppm),
f. The cadmium content (ppm),
g. The chromium content (ppm),
h. The lead content (ppm),
i. The PCB content (ppm),
j. The total halogen content (ppm),
k. The mercury content (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:

a. The asphalt production rate for each month.

b. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the production rates.

Also during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

4. For each shipment of #2 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.

5. The permit to install for this emissions unit (P902) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level

concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: **formaldehyde**
TLV (ug/m3): **370**
Maximum Hourly Emission Rate (lbs/hr): **1.26**
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **2.5**
MAGLC (ug/m3): **8.8**

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit pressure drop excursion reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term B.1.

2. The permittee shall submit deviation (excursion) reports that identify all shipments of #2 fuel oil which did not comply with the allowable limit in term B.6.

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 or term A.2.e. 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.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production rates (levels).

5. The permittee shall submit annual reports which specify the total PM, PM 10, SO2, NOx, OC and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

   Reports are to be sent to:

   Ohio Environmental Protection Agency
   DAPC - Permit Management Unit
   P. O. Box 163669
   Columbus, Ohio 43216-3669

   and

   Hamilton County Department of Environmental Services
   250 William Howard Taft Road
   Cincinnati, Ohio 45219

7. The deviation reports shall be submitted in accordance with the reporting requirements of the

General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall calculate the CO and NOX emission rates using emission factors from AP-42 Table 11.1-8. and SO2 emission rates using emission factors from AP-42 Table 8.1-5.

2. The permittee shall calculate the PM, PM_{10} and OC emission rates using the emission factors submitted in PTI 14-05058.

3. The fugitive emissions were calculated using the Ohio EPA Reasonably Available Control Measures manual, section 2.21-3.

4. Compliance with the visible particulate emissions limitations in term A.1 and A.2 shall be demonstrated by using Method 9, 40 CFR Part 60 Subpart A.

5. 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 60 days after achieving maximum production but no later than 180 days after start-up.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable PM/PM_{10}, CO, NO_x, SO_2 and OC emission rates and the visible emissions limitation.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Allowable	Test Method
10.8 lb PM/hr	5 or 5A
4.3 lb PM_{10}/hr	5 or 5A
10% opacity as a 6 minute average from any stack	9
20% opacity as a 3 minute average from fugitive PM	9
19.6 lb CO/hr	10
26.3 lb NOx/hr	7
35.8 lb SO_2/hr	6
43.4 lb OC/hr	25

   Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency.

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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

6. Compliance with the used oil specifications shall be demonstrated by the chemical analysis which is submitted with each shipment from the supplier.

7. Compliance with the pressure drop limitation in term B.1 shall be demonstrated by the record keeping in term C.1.

8. Compliance with the production rate limitation in term B.3 shall be demonstrated by the record keeping in term C.3.

9. Compliance with the sulfur content limitation in term B.6 shall be demonstrated by the record keeping in term C.4.

F. Miscellaneous Requirements

Emissions Unit ID: **P902**

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.4., D and E.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05058 Facility ID: 1431140014

FACILITY NAME Barrett Paving Materials, Inc.

FACILITY DESCRIPTION 350 TPH drum mix asphalt plant CITY/TWP Cincinnati

SIC CODE 2951 SCC CODE 3-05-002-05 EMISSIONS UNIT ID P902

EMISSIONS UNIT DESCRIPTION 350 TPH drum mix asphalt plant

DATE INSTALLED upon pti issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	21.3	26.6	21.3	26.6
PM_{10}	attainment	13.8	17.4	13.8	17.4
Sulfur Dioxide	attainment	35.8	44.7	35.8	44.7
Organic Compounds	attainment	43.4	54.3	43.4	54.3
Nitrogen Oxides	attainment	26.3	32.8	26.3	32.8
Carbon Monoxide	attainment	19.6	24.5	19.6	24.5
Lead	attainment	0.37	0.46	0.37	0.46
Other: Air Toxics	unclassified	see calcs.			

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60 NESHAP? PSD? OFFSET POLICY?

Subpart I

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, production limitations, use of a fabric filter and compliance with the Ohio EPA's Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? yes YES NO

IDENTIFY THE AIR CONTAMINANTS: Formaldehyde

NEW SOURCE REVIEW FORM B

PTI Number: 14-05058 Facility ID: 1431140014

FACILITY NAME Barrett Paving Materials, Inc.

FACILITY DESCRIPTION 350 TPH drum mix asphalt plant CITY/TWP Cincinnati

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	☐
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b**.wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

Permit Review Narrative
14-05058

Barrett Paving Materials Inc. Plant # 95
24 Byrnes Lake Drive
Cincinnati, Ohio 45216

Premise Number: 1431140014

Barrett Paving Materials Inc., wishes to replace their existing asphalt plant at the Carthage location with a new 350 TPH drum mix asphalt plant. This facility is requesting synthetic minor status and will have an annual production limit of 875,000 tons per year. A monthly rolling summation has been incorporated to assure compliance with this production limit.

This facility will be regulated by 40 CFR Part 60 Subpart I, OAC rules 3745-31-05 (BAT), 3745-15-07, 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08 and 3745-17-11.

This facility has allowable emission rates as follows: for PM, 21.3 lbs/hr and 26.6 TPY; for PM10, 13.8 lbs/hr and 17.4 TPY; for SO2, 35.8 lb/hr and 44.7 TPY; for OC's,43.4 lb/hr and 54.3 TPY; for NOx, 26.3 lbs/hr and 32.8 TPY; and for CO, 19.6 lb/hr and 24.5 TPY. Since this permit allows the facility to combust used fuel oil the following emissions rates shall also apply: for arsenic, 0.030 lb/hr and 0.038 TPY; for cadmium, 0.012 lb/hr and 0.015 TPY; for chromium, 0.06 lb/hr and 0.08 TPY; for lead, 0.37 lb/hr and 0.46 TPY; for PCB's, 0.06 lb/hr and 0.08 TPY; for HCL, .044 lb/hr and.056 TPY; and for mercury, 0.006 lb/hr and 0.008 TPY.

BAT is the use of a baghouse with a control efficiency of 99% to control the particulate emissions from the dryer, an annual asphalt production limit, maintenance of the aggregate in a moist condition and limitation of visible emissions. Toxic screening and new source review modeling was conducted for this emissions unit.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05058 Facility ID: 1431140014

FACILITY NAME Barrett Paving Materials, Inc.

FACILITY DESCRIPTION 350 TPH drum mix asphalt plant CITY/TWP Cincinnati

Based on the efficiency of the control equipment and the annual production limit, I recommend approval of this PTI.

Permit Fee: P902: $1000

Prepared By: Thomas P. Wittekind
Date Prepared: December 6, 2000

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **14-05058**

A. Source Description:

Barrett Paving Materials Inc. has submitted a permit to install application for a 350 ton per hour drum mix asphalt plant. This equipment is used in the production of asphaltic concrete.

B. Facility Description:

This facility is located in Hamilton County, Ohio and will be a minor facility. Hamilton County is classified as attainment for all pollutants.

C. Source Emissions:

Potential emissions of PM/PM10, SO2, NOx and OC from this emissions unit (including fugitive particulate emissions) are above the threshold to be considered a major facility for Title V purposes. Therefore Barrett Paving Materials Inc. will have a production limit of 875,000 tons per year and is required to use a baghouse for control of particulate matter. Parametric monitoring of the baghouse will be required in order to ensure that the baghouse is operating within the allowable pressure drop range. Compliance with the annual production limit will be based upon a rolling, 12-month summation. This facility will maintain monthly records and submit excursion reports that identify all exceedances of the rolling, 12-month production rate limitation.

D. Conclusion:

With this permit, the federally enforceable terms and conditions will limit the annual asphalt production and require the use of control equipment so that the facility has a potential to emit less than 100 tons per year of PM/PM10, SO2, NOx and OC. Barrett Paving Materials Inc. will not be considered a major facility for the purpose of Title V permitting.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NEW SOURCE REVIEW FORM B

PTI Number: 14-05058 Facility ID: 1431140014

FACILITY NAME Barrett Paving Materials, Inc.

FACILITY DESCRIPTION 350 TPH drum mix asphalt plant CITY/TWP Cincinnati

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	54.3
PM	26.6
PM-10	17.4
SO2	44.7
NOx	32.8
CO	24.5