



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
WARREN COUNTY**

CERTIFIED MAIL

Application No: 14-04937

DATE: 7/18/00

Barrett Paving Material Inc
Daniel Koeninger
7374 Main Street
Cincinnati, OH 45244-0000

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 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 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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
KY

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OH-KY-IN Reg Coun of Govt



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-04937

Application Number: 14-04937
APS Premise Number: 1483000265
Permit Fee: **To be entered upon final issuance**
Name of Facility: Barrett Paving Material Inc
Person to Contact: Daniel Koeninger
Address: 7374 Main Street
Cincinnati, OH 45244-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4000 Turtlecreek Road
Lebanon, Ohio**

Description of proposed emissions unit(s):
Modification to 410 TPH asphaltic concrete batch plant (Plant #93).

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

Barrett Paving Material Inc

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Facility ID: 1483000265

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

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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

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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

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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

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
OC	36.3
PM	11.5
SO ₂	34.5
NO _x	27.7
CO	99.5
PM ₁₀	8.2

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Emissions Unit ID: **P902**

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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 - 410 TPH asphaltic concrete batch plant with fabric filter -

Modification

OAC rule 3745-31-05(D)

40 CFR Part 60, Subpart I

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

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-11(B)

9.2 pounds PM/hour (stack),
8.2 pounds PM/hour (fugitive),

3.1 pounds PM₁₀/hour (stack),
8.2 pounds PM₁₀/hour (fugitive),

139.4 pounds CO/hour,
69.7 pounds NO_x/hour,
98.4 pounds SO₂/hour,
50.8 pounds OC/hour,

0.039 pound arsenic/hour,
0.013 TPY arsenic*
0.016 pound cadmium/hour,
0.005 TPY cadmium*;
0.078 pound chromium/hour;
0.027 TPY chromium*;
0.78 pound lead/hour,
0.27 TPY lead*;
0.078 pound PCB's/hour,
0.027 TPY PCB's*;
0.057 pound HCl/hour,
0.019 TPY HCl*;
0.008 pound mercury/hour;
0.003 TPY mercury*.

See terms A.2.b - A.2.f

The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart I and OAC rule 3745-31-05(D)

5.6 TPY* PM from stack emissions
2.3 TPY* PM₁₀ from stack

emissions

5.9 TPY* PM from fugitive emissions
5.9 TPY* PM₁₀ from fugitive emissions

99.5 TPY* CO
27.7 TPY* NO_x
34.5 TPY* SO₂
36.3 TPY* OC

See term B.2

0.04 grain PM/dscf

The opacity limitation established by this rule is less stringent than those established by OAC rule 3745-31-05(A)(3)(BAT)

The emissions limitations established by this rule are less stringent than those established by OAC rule 3745-31-05(A)(3)(BAT)

The emissions limitations established by this rule are less stringent than those established by OAC rule 3745-31-05(A)(3)(BAT)

* The TPY emission limitations are based on a rolling, 12-month summation.

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Emissions Unit ID: **P902****Issued: To be entered upon final issuance****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 All recycled, used oil burned in emissions unit P902 shall meet the following specifications:

Contaminant/Property Allowable Specifications

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 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.

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

2.d Visible particulate emissions from any fugitive dust emissions point associated with emissions unit P902 shall not exceed 20% percent opacity, as a three-minute average.

2.e 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.f** 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.g** 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.

B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 5.0 inches of water while the emissions unit is in operation.
2. The maximum annual asphalt production rate for emissions unit P902 shall not exceed 585,000 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 the modified emissions unit P902, the permittee shall not exceed the production levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production (Tons)</u>
1	48,750
1-2	97,500
1-3	146,250
1-4	195,000
1-5	243,750
1-6	292,500
1-7	341,250
1-8	390,000
1-9	438,750
1-10	487,500
1-11	536,250
1-12	585,000

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

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12-month summation of the production rates.

3. The maximum annual asphalt production rate, using oil in the drum dryer burner, for emissions unit P902 shall not exceed 281,000 tons per year as a rolling, 12-month summation of the asphalt production rates, using oil in the drum dryer burner. To ensure enforceability during the first 12 calendar months of operation following the startup of the modified emissions unit P902, the permittee shall not exceed the asphalt production specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Asphalt Production (tons) using oil</u>
1	23,417
1-2	46,833
1-3	70,250
1-4	93,667
1-5	117,083
1-6	140,500
1-7	163,917
1-8	187,333
1-9	210,750
1-10	234,167
1-11	257,583
1-12	281,000

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

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 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.

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 P902:
 - a. The monthly asphalt production, in tons.
 - b. The monthly asphalt production while using oil in the drum dryer burner, in tons.
 - c. For the first 12 calendar months following the startup of the modified emissions unit P902, the cumulative asphalt production calculated by adding the current month's asphalt production to the asphalt production for each calendar month since the startup of the modified emissions unit P902.
 - d. Beginning after the first 12 calendar months following the startup of the modified emissions unit P902, 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.
 - e. For the first 12 calendar months following the startup of the modified emissions unit P902, the cumulative asphalt production using oil in the drum dryer burner calculated by adding the current month's asphalt production using oil to the asphalt production using oil for each calendar month since the startup of the modified emissions unit P902.
 - f. Beginning after the first 12 calendar months following the startup of the modified emissions unit P902, the rolling, 12-month summation of asphalt production using oil in the drum dryer burner calculated by adding the current month's asphalt production using oil to the asphalt production using oil for the preceding eleven calendar months.
4. 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

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Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 1.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.6

MAGLC (ug/m3): 10,333

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 its 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 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 deviation (excursion) reports which 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.
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. 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 annual reports which specify the asphalt production rate (in tons), asphalt production rate using oil in the drum dryer burner (in tons) and the PM, NO_x, SO₂, OC and CO emissions for emissions units P902 for the previous calendar year. For the first 12

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calendar months following the startup of the modified emissions unit P902, these reports shall include the cumulative asphalt production rate and cumulative asphalt production rate using oil for each calendar month in the reporting period. Beginning after the first 12 calendar months following the startup of the modified emissions unit P902, these reports shall include the rolling, 12-month summation of asphalt production rate and asphalt production rate using oil for each calendar month in the reporting period. These reports shall be submitted by January 31 of each year.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
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

E. Testing Requirements

1. Compliance with the PM, PM₁₀, CO, NO_x, OC, and SO₂ emissions limits on the Air Emissions Summary page of this permit shall be demonstrated by the record keeping in Term C.3 and the following:

- a. When using natural gas, the emission factors for CO, NO_x, and SO₂ from Compilation of Air Pollution Emission Factors (AP-42), Tables 11.1-2 and 11.1-7, Fifth Edition.
 - b. When using used oil, the emission factors for PM, CO, NO_x, OC, and SO₂ from Compilation of Air Pollution Emission Factors (AP-42), Tables 11.1-2 and 11.1-7, Fifth Edition.
 - c. For PM₁₀ emissions from the stack, the emission factors from Compilation of Air Pollution Emission Factors (AP-42), Table 11.1-3, Fifth Edition; Summary of Particle Size Distribution.
 - d. For fugitive emissions from materials unloading to the cold storage feed bins and the recycled material (RAP) bin, the emission factors for PM/PM₁₀ from RACM Table 2.21-1.
 - e. For PM and OC from the exhaust stack, the results of the emission testing will be used to demonstrate compliance.
2. Compliance with the HAPs emissions limitations on the Air Emissions Summary Page of this permit shall be demonstrated by the record keeping in Term C.2 and C.3, the density of the oil, and the conversion factor 2.3 gallons of oil used per ton of asphalt produced (supplied by the facility).
 3. Compliance with the used oil specifications in Term A.2 shall be demonstrated by the record keeping in Term C.2.
 4. Compliance with the annual asphalt production limitations in Term B.2 shall be demonstrated by the record keeping in Term C.3.
 5. Compliance with the annual asphalt production limitation when using oil in the drum dryer burner in Term B.3 shall be demonstrated by the record keeping in Term C.3.
 6. Compliance with the visible emissions limitations in Terms A.2 shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.
 7. 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 issuance of this permit.

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- b. The emission testing shall be conducted to demonstrate compliance with the allowable PM emission rate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5. 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

Barrett Paving Material Inc
PTI Application 14-04027
Issue

Facility ID: 1483000265

Emissions Unit ID: **P902**

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.

F. Miscellaneous Requirements

1. If probable cause exists indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. The hourly emission limitation(s) outlined in this permit are based upon the maximum hourly production rate. Therefore, no hourly records are required.
3. The terms and conditions of this PTI supersede those established in PTI 14-1149 and 14-4660.
4. The following terms and conditions of this permit are federally enforceable: A.2.a - A.2.g, B.1 - B.3, C.1 - C.3., D.1 - D.6 and E.1 - E.7.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04937 Facility ID: 1483000265

FACILITY NAME Barrett Paving Material Inc

FACILITY DESCRIPTION Modification to 410 TPH asphaltic concrete batch plant (Plant #93). CITY/TWP Lebanon

SIC CODE 2951 SCC CODE 3-05-002-01 EMISSIONS UNIT ID P902

EMISSIONS UNIT DESCRIPTION Gencor Industries 410 TPH asphaltic concrete batch plant with fabric filter

DATE INSTALLED 12/98

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		15.6	3.2	17.4	11.5
PM ₁₀		8.1	2.3	11.3	8.2
Sulfur Dioxide		2.1	0.4	98.4	34.5
Organic Compounds		50.8	10.2	50.8	36.3
Nitrogen Oxides		10.3	2.0	69.7	27.7
Carbon Monoxide		139.4	28.1	139.4	99.5
Lead				0.78	0.27
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 60

NESHAP?

PSD?

OFFSET POLICY?

Subpart I

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination 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*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Xylene

NEW SOURCE REVIEW FORM B

PTI Number: 14-04937 Facility ID: 1483000265

FACILITY NAME Barrett Paving Material Inc

FACILITY DESCRIPTION	Modification to 410 TPH asphaltic concrete batch plant (Plant #93).	CITY/TWP	Lebanon
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Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Please provide any additional permit specific notes as you deem necessary:

Permit Review Narrative
PTI 14-04937

Barrett Paving Materials, Inc.
4000 Turtle Creek Road
Lebanon, OH

PN: 1483000265
Emissions Unit: P902

Barrett Paving Materials plans to modify the existing asphalt batch plant currently located at 4000 Turtle Creek Road in Lebanon, OH (Warren County). They have requested an increase in the allowable limitations for OC to 0.124 pounds/ton asphalt produced. There will be an increase of 27.5 TPY in allowable OC emissions above the AP-42 based limit. The facility has already performed testing for OC, therefore no further OC testing is needed. No increment modeling is required for SO₂ or NO_x since the net increase is below the trigger levels.

The applicable regulations are 40 CFR Part 60 Subpart I, OAC rule 3745-15-07, OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1) and OAC rule 3745-31-05(BAT).

BAT requires: use of a fabric filter; compliance with usage and emissions limits; aggregate unloaded to the cold storage bins shall have a moisture content sufficient to minimize or eliminate VEs from the screen and transfer point to the dryer and compliance with the air toxics policy.

A preliminary synthetic minor permit to install should be issued as the emissions unit is in compliance with the applicable regulations.

The permit fee is \$1000 based on PWR of 410 tons/hr for P902.

Prepared by: Chad Powell
Date Prepared: May 8, 2000

Permit To Install Synthetic Minor Write-Up

Synthetic Minor Determination

Barrett Paving Materials
PTI 14-04937

NEW SOURCE REVIEW FORM B

PTI Number: 14-04937 Facility ID: 1483000265

FACILITY NAME Barrett Paving Material Inc

FACILITY DESCRIPTION	Modification to 410 TPH asphaltic concrete batch plant (Plant #93).	CITY/TWP	Lebanon
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A. Emissions Units Description

The Permit to Install (PTI 14-04937) covers a 410 ton/hour batch hot mix asphalt plant (emissions unit P902). The permittee has applied for a federally enforceable synthetic minor PTI.

B. Facility Emissions an Attainment Status

Barrett Paving Material is currently a minor source for all criteria pollutants. The facility is located in Warren county which is currently a moderate non-attainment area for ozone and attainment for all other pollutants. The permittee requests to incorporate federally enforceable limitations in this PTI limiting PM, CO, NO_x and SO₂ emissions to less than the major source thresholds.

C. Source Emissions

The PTI will limit the annual asphalt production and the annual asphalt production while using oil in the drum dryer burner for emissions unit P902. The facility will keep records and submit reports as described in the PTI to ensure compliance with the emission and production limits.

D. Conclusion

The terms and conditions in this PTI will limit the potential emissions to less than the major source thresholds for PM, CO, NO_x and SO₂. The permittee will maintain records and submit reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance. This facility will be a "Synthetic Minor" facility not subject to the Part 70 Title V requirements. As this modification constitutes a minor modification to a facility minor for all criteria pollutants, the emissions offset policy and PSD do not apply.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	36.3
PM	11.5
SO ₂	34.5
NO _x	27.7
CO	99.5
PM ₁₀	8.2