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Facility Name: **Barrett Paving Materials, Inc.**

Application Number: **14-4586**

Date: **November 4, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(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.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

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

#### APPLICABILITY

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

#### BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal &amp; OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|-------------------------------|-------------------------------------|--------------------------|---|--|

AIR EMISSION SUMMARY

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

| <u>Ohio EPA Source Number</u> | <u>Mod Cont'd</u> | <u>Source Identification Description</u>    |
|-------------------------------|-------------------|---|
| P901                          |                   | 400 Ton per hour asphalt dryer/coater drum. |
| Modi-fi                       |                   |   |
| ca-tion                       |                   |   |

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| <u>Ohio<br/>EPA<br/>Source<br/>Number</u> | <u>Source<br/>Identification<br/>Number</u> | <u>BAT<br/>Determination</u> | <u>Applicable Federal<br/>&amp; OAC Rules</u> | <u>Permit Allowable Mass<br/>Emissions and/or<br/>Control/Usage<br/>Requirements</u> |
|---|---|------------------------------|---|--|
|---|---|------------------------------|---|--|

BAT  
Determination

Use of baghouse and cyclone for control of particulate emissions; production limitations; maintenance of aggregate in a moist condition; visible emission limitations and emission limitations.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal &amp; OAC Rules</u>  | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>   |
|-------------------------------|-------------------------------------|--------------------------|--|--|
|                               |                                     |                          |  | 28.0 TPY CO*   |
|                               | Applicable Federal & OAC Rules      |                          | Permit Allowable Mass Emissions and/or Control/Usage Requirements  | 0.035 lb Arsenic/hour<br>0.043 TPY Arsenic*<br>0.015 lb Cadmium/hour<br>0.017 TPY Cadmium*   |
|                               | 3745-15-07;                         |                          | See General Terms  |  |
|                               | 3745-17-07 (A) and (B);             |                          | See Additional Special Term and Condition A.1  | 0.07 lb Chromium/hour  |
|                               | 3745-17-08 (B);                     |                          | See Additional Special Term and Conditions A.2 and A.3   | 0.09 TPY Chromium*<br>0.42 lb lead/hour  |
|                               | 3745-17-11;                         |                          | Less Stringent**   | 0.52 TPY Lead*   |
|                               | 3745-31-05                          |                          | 5.6 lbs PM/hour (Stack)<br>12.0 lbs PM/hour (Fugitive)<br>22.0 TPY PM*<br>16.4 lbs PM <sub>10</sub> /hour<br>20.5 TPY PM <sub>10</sub> * | 0.07 lb PCB/hour<br>0.09 TPY PCB*<br>0.007 lb Mercury/hour<br>0.009 TPY Mercury*<br>0.051 lb Hcl/hour<br>0.064 TPY Hcl*<br>0.04 gr/dscf PM |
|                               |                                     | 40 CFR Part 60 Subpart 1 | 40.9 lbs SO <sub>2</sub> /hour<br>51.1 TPY SO <sub>2</sub> *<br>30.0 lbs NO <sub>x</sub> /hour<br>37.5 TPY NO <sub>x</sub>               |  |
|                               |                                     |                          | 27.6 lbs OC/hour<br>34.5 TPY OC*<br>22.4 lbs CO/hour   |  |

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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| Organic Compound | 34.5             |
| PM               | 22.0             |
| SO <sub>2</sub>  | 51.1             |
| NO <sub>x</sub>  | 37.5             |
| CO               | 28.0             |
| PM <sub>10</sub> | 20.5             |

- \* All TPY Limits are based on a rolling, 12-month summation.
- \*\* The emission limitation established by this rule is less stringent than those established by OAC rule 3745-31-05(BAT).

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

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### **WASTE DISPOSAL**

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

### **MAINTENANCE OF EQUIPMENT**

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

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

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

### **AIR POLLUTION NUISANCES PROHIBITED**

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

### **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.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emission Limitations and/or Control Requirements**

1. The following visible particulate emissions limitations shall not be exceeded:
  - a. visible particulate emissions from the fabric filter dust collector outlet shall not exceed ten percent (10%) opacity, as a six-minute average; and,
  - b. visible particulate emissions of fugitive dust from any fugitive dust emissions point shall not exceed twenty percent (20%) opacity as a three minute average.
2. The permittee shall maintain aggregate in a moist condition so as to minimize or eliminate at all times visible emissions of fugitive dust.
3. The permittee shall implement the following control measure for this emissions unit:
  - a. the drop height at all transfer points shall be minimized in order to minimize or eliminate visible emissions of fugitive dust.
4. The maximum particulate emissions from the fabric filter stack shall not exceed 0.04 grains per dry standard cubic foot and 5.6 pounds per hour.
5. All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property

Allowable Specifications

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|          |                 |
|----------|-----------------|
| arsenic  | 5 ppm, maximum  |
| cadmium  | 2 ppm, maximum  |
| chromium | 10 ppm, maximum |
| lead     | 60 ppm, maximum |
| PCB's    | 10 ppm, maximum |

| <u>Contaminant/Property</u> | <u>Allowable Specifications</u> |
|-----------------------------|---------------------------------|
| 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%                           |

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

- 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 3745-58-50. 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**

- The pressure drop across the baghouse shall be maintained within the range of not less than 3 inches of water or greater than 6 inches of water while the emissions unit is in operation.
- The maximum asphaltic concrete production from this plant shall not exceed 400 tons per hour.
- The maximum annual production rate for this emissions unit shall not exceed 1,000,000 tons per year, based

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upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate

limitation shall not exceed the production levels specified in the following table:

| <u>Month</u> | <u>Maximum Allowable<br/>Cumulative Production</u> |
|--------------|--|
| 1-1          | 500,000  |
| 1-2          | 500,000  |
| 1-3          | 500,000  |
| 1-4          | 500,000  |
| 1-5          | 500,000  |
| 1-6          | 500,000  |
| 1-7          | 583,333  |
| 1-8          | 666,667  |
| 1-9          | 750,000  |
| 1-10         | 833,333  |
| 1-11         | 916,667  |
| 1-12         | 1,000,000  |

After the first 12 months of operation following the issuance of this permit, compliance with the annual production 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.

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**C. Monitoring and 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 Hamilton County Dept. of Env. Services) 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:

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- a. the production rate for each month; and,
  
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the production rates.

Also, during the first 12 calendar months of operation following the 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. 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 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.

**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 above.
  
2. 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 Hamilton County Dept. of Env. Services; and,

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- 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 Hamilton County Dept. of Env. Services. 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 30, April 30, July 30, and October 30 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. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil or #2 fuel oil exceeds the oil specifications. An identification number from USEPA shall be obtained prior to the combustion of any used oil.

Before the permittee accepts the first shipment of any off-specification used oil from a marketer, the permittee must provide the marketer a one-time, written and signed notice certifying that:

- a. the permittee has notified USEPA of its used oil management activities and that the notice included the location and description of those activities; and,
- b. the permittee will burn the used oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-58-42.

A copy of each certification notice that the permittee

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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 Dept. of Env. Services.

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 levels.
5. The permittee shall submit annual reports which specify the total PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, OC and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Compliance Methods/Testing Requirements**

1. The permittee shall calculate the CO, NO<sub>x</sub>, and SO<sub>2</sub> emission rates using emission factors from AP-42 Table 8.1-5.
2. The permittee shall calculate the PM and PM<sub>10</sub> emission rates using the emission factors as determined during stack testing.
3. The fugitive emissions were calculated using the Ohio EPA Reasonably Available Control Measures manual.
4. Compliance with OAC rule 3745-17-07 (A)(1) shall be demonstrated by the methods outlined OAC 3745-17-03(B)(1).
5. Compliance with OAC rule 3745-17-07 (B)(1) shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(3).
6. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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- a. the emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial startup;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate, visible particulate emission limitation, and the allowable OC emission rate;
- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass particulate and OC emission rate(s): Method 5, 9, and 25 or 25A . Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; 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 Hamilton County Dept. of Env. 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 Dept. of Env. 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 Dept. of Env. Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Dept. of Env. 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 Dept. of Env. 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 Dept. of Env. Services.

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

**F. Miscellaneous Requirements**

1. This Permit to Install supersedes Permit to Install 14-4498.