



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/3/2011

Dan Gennaro  
Barrett Paving - South Lebanon Portable Drum  
600 Shpeherd Ave  
Cincinnati, OH 45215

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1483980486  
Permit Number: P0100912  
Permit Type: Renewal  
County: Warren

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Barrett Paving - South Lebanon Portable Drum**

Facility ID:	1483980486
Permit Number:	P0100912
Permit Type:	Renewal
Issued:	5/3/2011
Effective:	5/3/2011
Expiration:	5/3/2016





Division of Air Pollution Control
Permit-to-Install and Operate
for
Barrett Paving - South Lebanon Portable Drum

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## Authorization

Facility ID: 1483980486  
Application Number(s): A0032656  
Permit Number: P0100912  
Permit Description: FEPTIO, as a Renewal, for a Legacy Operating Permit following PTIs 14-05959 and 14-05978 for one (1) portable 400 TPH counter-flow drum mix HMA plant with fabric filter and support activities (plant roadways and storage piles).  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/3/2011  
Effective Date: 5/3/2011  
Expiration Date: 5/3/2016  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Barrett Paving - South Lebanon Portable Drum  
1466 West Mason-Morrow-Milgrove Road  
South Lebanon, OH 45036

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

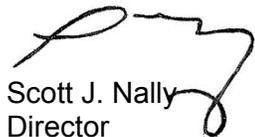
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0100912

Permit Description: FEPTIO, as a Renewal, for a Legacy Operating Permit following PTIs 14-05959 and 14-05978 for one (1) portable 400 TPH counter-flow drum mix HMA plant with fabric filter and support activities (plant roadways and storage piles).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Plant Roadways
Superseded Permit Number:	14-05978
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Paved Roadways
Superseded Permit Number:	14-05978
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Storage Piles
Superseded Permit Number:	14-05978
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	Portable Plant
Superseded Permit Number:	14-05959
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**



1. F001, Plant Roadways

Operations, Property and/or Equipment Description:

Portable unpaved roadways and parking areas, with a maximum of 120,000 vehicles miles traveled per year

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) from this emission unit shall not exceed 18.18 tons per year (TPY).  There shall be no visible PE from the unpaved roadways and/or parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.  Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c. through b)(2)h.

b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 4.63 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See b)(2)c. through b)(2)g.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

FEPTIO P0100912 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for particulate matter emissions ten microns and less in diameter (PM10):

- i. a maximum of 120,000 vehicles miles traveled (VMT) per year; and
- ii. a 95 % control efficiency for PM10 when employing the best available control measures as outlined in b)(2)c. through b)(2)g. and when implementing the inspection requirements outlined in d)(1); and
- iii. restrict PM10 emissions to 4.63 TPY.

- c. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- f. Any unpaved roadway or parking area that is subsequently paved, will require a permit for paved roadways and parking areas.
- g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- i. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
  - i. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
  - ii. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;

- iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
- iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- v. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- j. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas                      minimum inspection frequency

all roads and parking areas                                      daily

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(4) The permittee shall collect and record the following information annually for the purpose of determining annual PE/PM10 emissions:

- a. the actual VMT per year on each unpaved roadways/parking area segment as identified in the PTI application; and
- b. the total PE and PM10 emissions, in tons, using the calculation methods provided in f)(1)a. and f)(1)c. and replacing the voluntary restriction amounts with the actual amounts as estimated in d)(4)a. The permittee may assume a control efficiency of 95% provided that the control measures outlined in b)(2)c. through b)(2)g. were implemented and recorded pursuant to the requirements in d)(1) through d)(3).

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method:

a. Emission Limitation:

Fugitive particulate emissions (PE) from this emission unit shall not exceed 18.18 tons per year (TPY).

Applicable Compliance Method:

Compliance with the fugitive PE limitation shall be determined by using the emission factor equation in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used.

The annual PE emissions limitation established through OAC rule 3745-31-05(A)(3) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in AP-42. This emission limit was based on a maximum of 120,000 vehicle miles traveled per year and a 95 % control efficiency for PE:

$$\text{Equation 1a} \quad E = k(s/12)^a(W/3)^b$$

where k, a and b are empirical constants given in Table 13.2.2-2, and

E = size specific emission factor (lb/VMT)

s = surface material silt content (%)

W = mean vehicle weight (tons)

$$E = 4.9(4.8/12)^{0.7}(20/3)^{0.45} = 6.0594 \text{ lb PE/VMT}$$

$$6.0594 \text{ lb PE/VMT} \times 120,000 \text{ VMT/year} \times 1 \text{ Ton}/2000 \text{ lbs} \times (1-0.95) = 18.18 \text{ TPY PE}$$

b. Emission Limitation:

There shall be no visible PE from the unpaved roadways and/or parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

## c. Emission Limitation:

Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 4.63 TPY.

Voluntary restrictions which maintain the PM10 emissions to less than 10 tons per year.

## Applicable Compliance Method:

Compliance with the fugitive PM10 emission limitation shall be determined by using the emission factor equation in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used.

The annual PM10 emission limitation was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in AP-42. This emission limitation was based on a maximum of 120,000 vehicle miles traveled per year and a 95% control efficiency for PM10:

$$\text{Equation 1a} \quad E = k(s/12)^a(W/3)^b$$

where k, a and b are empirical constants given in Table 13.2.2-2, and

E = size specific emission factor (lb/VMT)

s = surface material silt content (%)

W = mean vehicle weight (tons)

$$E = 1.5(4.8/12)^{0.9}(20/3)^{0.45} = 1.5442 \text{ lb PM10/VMT}$$

$$1.5442 \text{ lb PM10/VMT} \times 120,000 \text{ VMT/year} \times 1 \text{ Ton/2000 lbs} \times (1-0.95) = 4.63 \text{ TPY PM10}$$

## g) Miscellaneous Requirements

(1) None.



2. F002, Paved Roadways

Operations, Property and/or Equipment Description:

Portable paved roadways and parking areas, with less than or equal to 40,000 vehicle miles traveled per year and a silt content less than or equal to 120 g/m<sup>2</sup>

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) from this emission unit shall not exceed 20.21 tons per year (TPY).  There shall be no visible PE from the paved roadways and/or parking areas except for a period of time not to exceed 1 minute during any 60-minute observation period.  Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c. through b)(2)g.

b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 3.94 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See b)(2)c. through b)(2)f.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

FEPTIO P0100912 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for particulate matter emissions ten microns and less in diameter (PM10):

- i. a maximum of 40,000 vehicles miles traveled (VMT) per year; and
- ii. a 95 % control efficiency for PM10 when employing the best available control measures as outlined in b)(2)c. through b)(2)f. and when implementing the inspection requirements outlined in d)(1); and
- iii. restrict PM10 emissions to 3.94 TPY.

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- f. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- h. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
  - i. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
  - ii. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
  - iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA

District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;

- iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- v. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- i. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	daily

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (4) The permittee shall collect and record the following information annually for the purpose of determining annual PE/PM10 emissions:
- a. the actual VMT per year on each paved roadways/parking area segment as identified in the PTI application; and
  - b. the total PE and PM10 emissions, in tons, using the calculation methods provided in f)(1)a. and f)(1)c. and replacing the voluntary restriction amounts with the actual amounts as estimated in d)(4)a. The permittee may assume a control efficiency of 95% provided that the control measures outlined in b)(2)c. through b)(2)f. were implemented and recorded pursuant to the requirements in d)(1) through d)(3).
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Fugitive particulate emissions (PE) from this emission unit shall not exceed 20.21 tons per year (TPY).

Applicable Compliance Method:

Compliance with the fugitive PE limitation shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used.

The annual PE emissions limitation established through OAC rule 3745-31-05(A)(3) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in AP-42. This emissions limit was based on a maximum of 40,000 vehicle miles traveled per year, and a 95% control efficiency for PE:

$$\text{Equation 1 } E = k(sL/2)^{0.65}(W/3)^{1.5} - C$$

where k is the particle size multiplier given in Table 13.2-1.2, and

E = particulate emission factor (having units matching the units of k)

sL = road surface silt loading (g/m<sup>2</sup>)

W = average weight (tons) of the vehicles traveling the road, and

C = emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear

$$E = 0.082(120/2)^{0.65} \times (20/3)^{1.5} - 0.00047 = 20.2053 \text{ lb PE/VMT}$$

$$20.2053 \text{ lb PE/VMT} \times 40,000 \text{ VMT/year} \times 1 \text{ Ton}/2000 \text{ lbs} \times (1-0.95) = 20.21 \text{ TPY PE}$$

b. Emission Limitation:

There shall be no visible PE from the paved roadways and/or parking areas except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test



Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. Emission Limitation:

Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 3.94 TPY.

Voluntary restrictions which maintain the PM10 emissions to less than 10 tons per year.

Applicable Compliance Method:

Compliance with the fugitive PM10 limitation shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used.

The annual PM10 emission limitation was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways. This emissions voluntary restriction was also based on a maximum of 40,000 vehicle miles traveled per year, and a 95% control efficiency for PM10:

$$\text{Equation 1 } E = k(sL/2)^{0.65}(W/3)^{1.5} - C$$

where k is the particle size multiplier given in Table 13.2-1.2, and

E = particulate emission factor (having units matching the units of k)

sL = road surface silt loading (g/m<sup>2</sup>)

W = average weight (tons) of the vehicles traveling the road, and

C = emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear

$$E = 0.016(120/2)^{0.65} \times (20/3)^{1.5} - 0.00047 = 3.9421 \text{ lb PM10/VMT}$$

$$3.9421 \text{ lb PM10/VMT} \times 40,000 \text{ VMT/year} \times 1 \text{ Ton}/2000 \text{ lbs} \times (1-0.95) = 3.94 \text{ TPY}$$

PM10

g) Miscellaneous Requirements

- (1) None.



3. F003, Storage Piles

Operations, Property and/or Equipment Description:

Portable storage piles, including load-in, load-out and wind erosion activities for facilities with a maximum production of 3,000,000 tons/year and a maximum storage pile surface area less than or equal to 15 acres

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) from this emission unit shall not exceed 10.97 tons per year (TPY).  There shall be no visible particulate emissions from material storage piles except for a period of time not to exceed 1 minute during any 60-minute observation period.  Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c. through b)(2)g.

b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 5.37 TPY.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See b)(2)c. through b)(2)g.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

FEPTIO P0100912 for this air contaminant sources takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for particulate matter emissions ten microns and less in diameter (PM10):

- i. a maximum load-in/load-out rate of 3,000,000 tons per year;
- ii. a maximum storage surface area greater than 6 acres but less than or equal to 15 acres;

- iii. a 95% control efficiency for PM10 when employing the best available control measures as outlined in b)(2)c. through b)(2)f. and when implementing the inspection requirements outlined in d)(1) through d)(3); and
  - iv. restrict PM10 emissions to 5.37 TPY.
- c. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.
- The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
  - e. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - f. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
  - g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

- h. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
- i. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
  - ii. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
  - iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
  - iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
  - v. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- i. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the

appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily
  - (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all	daily
  - (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	daily
  - (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
  - (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
  - (6) The permittee shall maintain records of the following information:
    - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in (6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (7) The permittee shall collect and record the following information annually for the purpose of determining annual PE/PM10 emissions:
  - a. the actual load-in/load-out rate, in tons per year;
  - b. the actual storage surface area of all storage piles as identified in the PTI application; and
  - c. the total PE and PM10 emissions, in tons, using the calculation methods provided in f)(1)a. and f)(1)c. and replacing the voluntary restriction amounts with the actual amounts as estimated in d)(4)a and d)(4)b. The permittee may assume a control efficiency of 95% provided that the control measures outlined in b)(2)c. through b)(2)f. were implemented and recorded pursuant to the requirements in d)(1) through d)(6).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emissions Limitations:

Fugitive particulate emissions (PE) shall not exceed 10.97 tons per year (TPY)

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air



Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06), for load-in operations, load-out operations, and wind erosion.

The annual PE emissions limitation established through OAC rule 3745-31-05(A)(3) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in AP-42. This emissions limit was based on a maximum production of 3,000,000 tons per year, a maximum storage surface area greater than 6 acres but less than or equal to 15 acres, and a 95% overall control efficiency for PE:

$$\text{Equation 1 } E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

where k is the particle size multiplier 0.74, and

E = particulate emission factor (lb/ton)

U = mean wind speed, (miles per hour, mph), and

M = material moisture content (%)

$$E = (0.74)(0.0032)(15/5)^{1.3}/(1/2)^{1.4} = 0.0261 \text{ lb PE/ton}$$

$$0.0261 \text{ lb PE/ton} \times 3,000,000 \text{ tons/year} \times 1 \text{ Ton}/2000 \text{ lbs} \times (1-0.95) = 1.96 \text{ TPY PE}$$

$$1.96 \text{ TPY PE} \times 2 \text{ for considering load-in and load-out operations} = 3.92 \text{ TPY PE}$$

N

$$\text{Equation 2 } k \sum_{i=1}^N P_i$$

which results in an uncontrolled emission factor of 9.4 tons PE/acre/year

$$9.4 \text{ tons PE/acre/yr} \times 15 \text{ acres} \times (1-0.95) = 7.05 \text{ TPY PE}$$

$$3.92 \text{ TPY PE} + 7.05 \text{ TPY PE} = 10.97 \text{ TPY PE}$$

b. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period

Applicable Compliance Method:

Compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").



c. Emission Limitation:

Fugitive emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit shall not exceed 5.37 TPY

Voluntary restrictions which maintain the PM10 emissions to less than 10 tons per year

Applicable Compliance Method:

Compliance with fugitive PM10 limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06), for load-in operations, load-out operations, and wind erosion.

The annual PM10 emission limitation was developed from the following equations using the information submitted by the permittee in PTI Application 14-05978, submitted on July 30, 2007, and information in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06), for load-in operations, load-out operations, and wind erosion. This emissions voluntary restriction was also based on a maximum production of 3,000,000 tons per year, a maximum storage surface area greater than 6 acres but less than or equal to 15 acres, and a 95% overall control efficiency for PM10:

$$\text{Equation 1 } E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

where k is the particle size multiplier 0.35, and

E = particulate emission factor (lb/ton)

U = mean wind speed, (miles per hour, mph), and

M = material moisture content (%)

$$E = (0.35)(0.0032)(15/5)^{1.3}/(1/2)^{1.4} = 0.0261 \text{ lb PM10/ton}$$

$$0.0123 \text{ lb PM10/ton} \times 3,000,000 \text{ tons/year} \times 1 \text{ Ton}/2000 \text{ lbs} \times (1-0.95) = 0.92$$

TPY PM10

$$0.92 \text{ TPY PM10} \times 2 \text{ for considering load-in and load-out operations} = 1.84 \text{ TPY}$$

PM10

$$\text{Equation 2 } \sum_{i=1}^N k P_i$$

which results in an uncontrolled emission factor of 4.7 tons PM10/acre/year



$$4.7 \text{ tons PM}_{10}/\text{acre}/\text{yr} \times 15 \text{ acres} \times (1-0.95) = 3.53 \text{ TPY PM}_{10}$$

$$1.84 \text{ TPY PM}_{10} + 3.53 \text{ TPY PM}_{10} = 5.37 \text{ TPY PM}_{10}$$

g) Miscellaneous Requirements

(1) None.



4. P901, Portable Plant

Operations, Property and/or Equipment Description:

Portable counter-flow drum mix asphalt plant with a maximum design capacity greater than 325 tons per hour and less than or equal to 400 tons per hour, controlled with a baghouse

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>Stack Emissions</u>  Emissions of nitrogen oxides (NOx) from this emission unit while burning natural gas shall not exceed 0.029 pound per ton of asphalt produced.  Emissions of NOx from this emission unit while burning on-spec used oil or number 2 fuel oil shall not exceed 0.053 pound per ton of asphalt produced.  Emissions of sulfur dioxide (SO <sub>2</sub> ) from this emission unit while burning natural gas shall not exceed 0.011 pound per ton of asphalt produced.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Emissions of SO<sub>2</sub> from this emission unit while burning on-spec used oil or number 2 fuel oil shall not exceed 0.066 pound per ton of asphalt produced.</p> <p>Emissions of carbon monoxide (CO) from this emission unit while burning any approved fuel shall not exceed 0.15 pound per ton of asphalt produced.</p> <p>Emissions of volatile organic compounds (VOC) from this emission unit while burning any approved fuel shall not exceed 0.10 pound per ton of asphalt produced.</p> <p>Particulate emissions (PE) from this emission unit while burning any approved fuel shall not exceed 0.03 grain (gr)/dry standard cubic feet (dscf).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 60, Subpart I.</p> <p>See b)(2)c. through b)(2)h.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit while burning any approved fuel shall not exceed 0.03 grain (gr)/dry standard cubic feet (dscf).</p> <p>Emissions of PM10 from stack and fugitive emission points from this emission unit shall not exceed 9.47 tons per year (TPY).</p> <p>See b)(2)a.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD, NAA-NSR, and Title V	<p><u>Stack Emissions</u></p> <p>Emissions of NO<sub>x</sub> from this emission unit shall not exceed 15.90 tons per rolling, 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Emissions of SO2 from this emission unit shall not exceed 19.80 tons per rolling, 12-month period.</p> <p>Emissions of CO from this emission unit shall not exceed 45.00 tons per rolling, 12-month period.</p> <p>Emissions of VOC from this emission unit shall not exceed 30.00 tons per rolling, 12-month period.</p> <p>Emissions of PE/PM10 from this emission unit shall not exceed 7.12 tons per rolling, 12-month period.</p> <p><u>Asphalt Load Out Emissions</u></p> <p>Emissions of CO from this emission unit shall not exceed 0.41 ton per rolling, 12-month period.</p> <p>Emissions of VOC from this emission unit shall not exceed 1.17 tons per rolling, 12-month period.</p> <p>Emissions of PE/PM10 from this emission unit shall not exceed 0.16 ton per rolling, 12-month period.</p> <p><u>Asphalt Silo Filling Emissions</u></p> <p>Emissions of CO from this emission unit shall not exceed 0.35 ton per rolling, 12-month period.</p> <p>Emissions of VOC from this emission unit shall not exceed 3.61 tons per rolling, 12-month period.</p> <p>Emissions of PE/PM10 from this emission unit shall not exceed 0.18 ton per rolling, 12-month period.</p> <p><u>Cold End Fugitive Dust Emissions</u></p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Emissions from the cold aggregate, sand and RAP loading, and the cold aggregate, sand and RAP transfer operations shall not exceed 4.23 tons PE per rolling, 12-month period and 2.01 tons PM10 per rolling, 12-month period.</p> <p>See b)(2)h., b)(2)j., and c)(1) through c)(4).</p>
e.	<p>OAC rule 3745-17-07(A)(1)            OAC rule 3745-17-11(B)(1)            OAC rule 3745-18-06(E)</p> <p>40 CFR Part 60, Subpart I            (§60.90 - §60.93)</p> <p>[In accordance with §60.90(a), this emission unit is a hot mix asphalt (HMA) facility that commenced construction or modification after June 11, 1973.]</p>	<p>The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
f.	<p>OAC rule 3745-17-07(B)            OAC rule 3745-17-08(B)</p> <p>These rules are applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08.</p>	<p>When applicable, the emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)k.</p>
g.	OAC rule 3745-279-11	See b)(2)i. and c)(5).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

FEPTIO P0100912 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for the pollutant PM10:

- i. compliance with 0.03 grain (gr)/dry standard cubic feet (dscf);
  - ii. see term c)(1); and
  - iii. restrict emissions of PM10 from stack and fugitive emission points to 9.47 TPY.
- c. 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 aggregate storage bins.
  - d. The aggregate loaded into the cold aggregate bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from conveyors and all transfer points to the dryer.
  - e. There shall be no visible emissions of fugitive dust from the enclosures for the rotary drum and the hot mix asphalt elevator.
  - f. Visible emissions of fugitive dust (from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10 per cent opacity, as a 3-minute average.
  - g. Visible particulate emissions from the stack shall not exceed 10 per cent opacity, as a six-minute average.
  - h. All number 2 and [non-specification] (on-spec) used oil burned in this emission unit shall have a sulfur content equal to or less than 0.5 per cent, by weight.
  - i. Each shipment of use oil burned in this emissions unit shall be [non-specification] (on-spec) oil and shall meet the used oil specifications contained in OAC rule 3745-279-11. The permittee shall determine that the used fuel oil meets these specifications by performing analyses or obtaining copies of analyses or other information from the supplier documenting that the used fuel oil does not exceed (except for flash point which shall not fall below) the following limitations:

Property/Contaminant Allowable Specifications

arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum

lead 100 ppm, maximum

total halogens less than 1,000 ppm; or less than 4,000 ppm if the presumption that the used oil contains hazardous waste is rebutted, as described below

flash point 100°F, minimum

The used oil burned in this emissions unit shall contain less than the quantifiable levels of PCBs as defined in 40 CFR 761.3, and also shall not exceed the following mercury limitation nor fall below the following heating value:

PCBs less than 2 ppm

heat content 135,000 Btu/gallon, minimum

mercury 1 ppm, maximum

Used oil containing 1,000 ppm or greater total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may receive and burn used oil equaling or exceeding 1,000 ppm total halogens, but less than 4,000 ppm, only if the permittee has successfully demonstrated, pursuant to OAC rule 3745-279-63, that the used oil does not contain a listed hazardous waste, by either acquiring and maintaining source process information which demonstrates that the used oil was contaminated by halogenated constituents that would not be listed hazardous waste or by demonstrating that the used oil does not contain significant concentrations of halogens by acquiring and maintaining representative analytical data. Acceptable analytical test protocols that can be used to analyze used oil for halogenated hazardous constituents include SW-846 Test Methods 9075, 9076, and 9077.\*

If analytical results demonstrate that used oil containing 1,000 ppm or more total halogens, but less than 4,000 total halogens, does not contain greater than 100 ppm of any individual halogenated hazardous constituent found in the F001 and F002 listings in OAC rule 3745-51-31 and there is no information suggesting that any other halogenated hazardous constituent (e.g., chlorinated pesticides) has come in contact with the oil, then the presumption that the oil contains hazardous waste has been successfully rebutted.\*\* The rebuttable presumption does not apply to either metal working oils/fluids containing chlorinated paraffins, if processed through a tolling arrangement as described in OAC rule 3745-279-24(C), or used oils contaminated with chlorofluorocarbons removed from refrigeration units.

The burning of used oil not meeting the above limitations is prohibited in this emissions unit and the fuel oil analyses shall document compliance with each limitation before it is burned. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter. If the used oil

analyses shows total halogens of 1,000 ppm or greater, the permittee shall obtain and maintain all the necessary records to successfully rebut the presumption that the used oil contains or has been mixed with a listed hazardous waste in accordance with this permit.

\*EPA publication SW-846, 3<sup>rd</sup> (or most current) edition, is available from the Government Printing Office, P.O. Box 371954, Pittsburgh, PA 15250-7954; 202/512-1800, document number 955-001-00000-1.

\*\*DHWM policy documented in "Used Oil Burners - New Guidance for Rebuttable Presumption", published April 2008 or most current policy.

- j. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.
- k. Based on the information in Permit to Install (PTI) Application 14-05959, submitted by the permittee in July 30, 2007, regarding the initial location of the portable plant:
  - i. this emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08; and
  - ii. this emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- l. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a "Notice of Site Approval" if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
  - i. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
  - ii. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
  - iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;

- iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- v. the Director has issued a "Notice of Site Approval", stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site.

- m. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

- n. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) **Operational Restrictions**

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual HMA production rate for this emissions unit shall not exceed 600,000 tons, based upon a rolling, 12-month summation of the production rates.
- (2) The permittee may substitute reclaimed asphalt pavement (RAP) in the raw material feed mix in amounts not to exceed 50 percent of all aggregate materials on an hourly basis. The permittee may substitute latex in the raw material feed mix in amounts not to

exceed 6 percent of all aggregate materials on an hourly basis. The permittee may not substitute raw materials for the aggregate such as shingles, slag, rubber, etc. without prior approval from Ohio EPA.

- (3) The permittee shall operate and maintain the fuel burner in accordance with the manufacturer's recommendations to ensure efficient combustion of the fuel(s) and to ensure compliance with the applicable emission limitations.
  - (4) The permittee shall only burn natural gas, number 2 fuel oil and/or on-spec used oil in this emissions unit. In order to use a fuel on an ongoing basis, the permittee shall complete the emissions testing for that fuel per paragraph f)(1)a.
  - (5) The permittee may not receive or burn any used oil which does not meet the standards in OAC rule 3745-279-11 and the specifications listed in this permit without first obtaining a permit-to-install or permit-to-install and operate that authorizes the burning of off-specification used oil. The burning of off-specification used oil, subject to OAC rule 3745-279-60 through 67, is prohibited as a fuel in this emissions unit.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain monthly records of the following information:
    - a. the HMA production rate for each month, in tons;
    - b. the rolling, 12-month summation of the HMA production rates, in tons;
    - c. the rolling, 12-month summation of the NOx, SO2, CO, VOC and PE/PM10 emissions, in TPY for each pollutant; and
    - d. the maximum percentage of RAP and/or other substitute additive used for any mix type.
  - (2) For each shipment of number 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.
  - (3) The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit (or if the oil is generated on site, the permittee shall conduct the chemical analyses), which shall contain the following information:
    - a. the date the used oil was received at the facility and the amount received;
    - b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/refiner, supplier, and/or marketer;
    - c. the results of the following chemical analyses, demonstrating that the used oil meets the standards in OAC rule 3745-279-11:

- i. arsenic content, in ppm;
  - ii. the cadmium content, in ppm;
  - iii. the chromium content, in ppm;
  - iv. the lead content, in ppm;
  - v. total halogens, in ppm;
  - vi. the flash point; and
  - vii. the sulfur content, in % by weight sulfur
- d. where the chemical analysis shows a total halogen content between 1,000 ppm, and below 4,000 ppm, the successful demonstration for the rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste, as described in OAC rule 3745-279-63(C); and
- e. the results of the analyses demonstrating that the used oil meets the heating value and the mercury and PCB limitations contained in this permit.

Each analysis shall be kept in a readily accessible location for a period of not less than 5 years\* following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses through an independent laboratory.

\*The Division of Air Pollution Control requires these records to be maintained for 5 years.

- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 8 inches of water.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (7) The permittee shall perform daily visible emission checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the enclosures for the rotary drum and the hot mix asphalt elevator serving this emissions unit. If visible emissions are observed, the permittee shall note the following in the operation log:
- a. the color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident in d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

## e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in d)(6) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. all days during which any visible fugitive particulate emissions were observed from the enclosures for the rotary drum and the hot mix asphalt elevator;
  - c. all days during which any visible emissions of fugitive dust were observed from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator; and
  - d. any corrective actions taken to eliminate the visible particulate emissions.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling 12-month asphalt production limitation;
  - ii. all exceedances of the rolling, 12-month NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, and/or PE/PM<sub>10</sub> emission limitations;
  - iii. all exceedances of the RAP and/or latex material usage limitations;
  - iv. an identification of each instance where raw materials such as shingles, slag, and/or rubber were used in place of aggregate without prior notification and approval;
  - v. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
  - vi. an identification of each incident of deviation described in v. where a prompt investigation was not conducted;

- vii. an identification of each incident of deviation described in v. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- viii. an identification of each incident of deviation described in v. where proper records were not maintained for the investigation and/or the corrective action;
- ix. any exceedance of the used oil standards in OAC rule 3745-279-11;
- x. any occasion where used oil containing 1,000 ppm or more total halogens was burned prior to receiving information demonstrating a successful rebuttal of the presumption that the used oil contains or has been mixed with a listed hazardous waste;
- xi. any exceedance of the limitations for mercury and/or PCBs; and
- xii. any deviation from the minimum heat content of 135,000 Btu/gallon;
- xiii. any exceedances of the sulfur content limitation;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

a. Emission Limitations

Emissions of nitrogen oxides (NO<sub>x</sub>) from this emission unit while burning natural gas shall not exceed 0.029 pound per ton of asphalt produced.

Emissions of NO<sub>x</sub> from this emission unit while burning on-spec used oil or number 2 fuel oil shall not exceed 0.053 pound per ton of asphalt produced.

Emissions of sulfur dioxide (SO<sub>2</sub>) from this emission unit while burning natural gas shall not exceed 0.011 pound per ton of asphalt produced.

Emissions of SO<sub>2</sub> from this emission unit while burning on-spec used oil or number 2 fuel oil shall not exceed 0.066 pound per ton of asphalt produced.

Emissions of carbon monoxide (CO) from this emission unit while burning any approved fuel shall not exceed 0.15 pound per ton of asphalt produced.

Emissions of volatile organic compounds (VOC) from this emission unit while burning any approved fuel shall not exceed 0.10 pound per ton of asphalt produced.

Particulate emissions (PE) from this emission unit while burning any approved fuel shall not exceed 0.03 grain (gr)/dry standard cubic feet (dscf).

Emissions of particulate matter 10 microns and less in diameter (PM10) from this emission unit while burning any approved fuel shall not exceed 0.03 grain (gr)/dry standard cubic feet (dscf).

#### Applicable Compliance Methods

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted at least 6 months prior to expiration of this permit. Emission testing for secondary fuels shall be conducted within 60 days after the switch to the secondary fuel;
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC and PE/PM10 for the primary fuel. Prior to secondary fuel emissions testing, the permittee shall consult the appropriate Ohio EPA District Office or local air agency to determine which pollutants should be tested;
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

NO<sub>x</sub>, Methods 1-4 and 7 or 7E of 40 CFR Part 60, Appendix A

SO<sub>2</sub>, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A

CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

PE/PM10, Methods 1-5 of 40 CFR Part 60, Appendix A

The VOC pounds per hour emission rate observed during the emission test shall be calculated in accordance with OAC paragraph 3745-21-10(C)(7) where the average molecular weight of the VOC emissions

equals 16. i.e., the VOC as carbon emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC as carbon emission rate observed during testing by 16 and dividing by 12.

- iv. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity and burning natural gas, number 2 fuel oil, or on-spec used oil for PE, VOC, CO, NO<sub>x</sub> and SO<sub>2</sub> and employing RAP to verify VOC emissions, 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 appropriate Ohio EPA District Office 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.

b. Emission Limitations – Stack Emissions

Emissions of NO<sub>x</sub> from this emission unit shall not exceed 15.90 tons per rolling, 12-month period.

Emissions of SO<sub>2</sub> from this emission unit shall not exceed 19.80 tons per rolling, 12-month period.

Emissions of CO from this emission unit shall not exceed 45.00 tons per rolling, 12-month period.

Emissions of VOC from this emission unit shall not exceed 30.00 tons per rolling, 12-month period.

Emissions of PE/PM<sub>10</sub> from this emission unit shall not exceed 7.12 tons per rolling, 12-month period.

Applicable Compliance Methods

Compliance with the applicable emission limitations shall be determined by multiplying the observed emission rate from the most recent emission testing, in pounds of each pollutant per ton of asphalt produced for each fuel, by the actual rolling 12 month summation of asphalt produced for each fuel, in tons per rolling 12-month period, as derived from the records required by term d)(1), summing the results for all fuels, and dividing by 2000.

The emission limitations were established based on information submitted by the permittee in permit to install (PTI) application 14-05959, submitted July 30, 2007:

$0.053 \text{ lbNO}_x/\text{ton} \times 600,000 \text{ tons/year} \times 1 \text{ Ton}/2000 \text{ lbs} = 15.90 \text{ TPY NO}_x$

$0.066 \text{ lb SO}_2/\text{ton} \times 600,000 \text{ tons/year} \times 1 \text{ Ton}/2000 \text{ lbs} = 19.80 \text{ TPY of SO}_2$

$0.15 \text{ lb CO}/\text{ton} \times 600,000 \text{ tons/year} \times 1 \text{ Ton}/2000 \text{ lbs} = 45.00 \text{ TPY CO}$

$0.10 \text{ lb VOC}/\text{ton} \times 600,000 \text{ ton/year} \times 1 \text{ Ton}/2000 \text{ lbs} = 30.00 \text{ TPY VOC}$

$0.03 \text{ gr/dscf} \times 36,900 \text{ dscf}/\text{min} \times 60 \text{ mins}/\text{hr} \times 1 \text{ lb}/7000 \text{ gr} \times 1 \text{ hr}/400 \text{ tons} \times 600,000 \text{ tons}/\text{year} \times 1 \text{ Ton}/2000 \text{ lbs} = 7.12 \text{ TPY PE}/\text{PM}_{10}$

c. Emission Limitations - Cold End Fugitive Dust Emissions

Emissions from the cold aggregate, sand and RAP loading, and the cold aggregate, sand and RAP transfer operations shall not exceed 4.23 tons PE per rolling, 12-month period and 2.01 tons PM10 per rolling, 12-month period.

Applicable Compliance Methods

Compliance shall be calculated based upon the following worst case calculations (Emission factors based on AP-42, 5th Edition, Table 11.12-2, 10/2001):

Hopper loading:

$600,000 \text{ tons of material}/\text{year} \times 0.0051 \text{ lb of PE}/\text{ton of material} = 3060 \text{ lbs of PE}/\text{yr}; \text{ and}$

$600,000 \text{ tons of material}/\text{year} \times 0.0024 \text{ lb of PM}_{10}/\text{ton of material} = 1440 \text{ lbs of PM}_{10}/\text{yr}.$

Aggregate transfer:

$600,000 \text{ tons of aggregate}/\text{year} \times 0.0069 \text{ lb of PE}/\text{ton of aggregate} = 4140 \text{ lb of PE}/\text{yr}; \text{ and}$

$600,000 \text{ tons of aggregate}/\text{year} \times 0.0033 \text{ lb of PM}_{10}/\text{ton of aggregate} = 1980 \text{ lb of PM}_{10}/\text{yr}.$



Sand transfer:

600,000 tons of sand/year X 0.0021 lb of PE/ton of sand = 1260 lb of PE/yr; and  
600,000 tons of sand/year X 0.00099 lb of PM10/ton of sand = 594 lb of PM10/yr.  
The sum of the above is 8460 lb of PE/yr X 1 ton/2000 lbs = 4.23 tons of PE; and  
The sum of the above is 4014 lb of PM10/yr X 1 ton/2000 lbs = 2.01 tons of PM10.

d. Emission Limitations – Asphalt Load out and Silo Filling

Asphalt Load Out Emissions:

Emissions of CO from this emission unit shall not exceed 0.41 ton per rolling, 12-month period.

Emissions of VOC from this emission unit shall not exceed 1.17 tons per rolling, 12-month period.

Emissions of PE/PM10 from this emission unit shall not exceed 0.16 ton per rolling, 12-month period.

Asphalt Silo Filling Emissions:

Emissions of CO from this emission unit shall not exceed 0.35 ton per rolling, 12-month period.

Emissions of VOC from this emission unit shall not exceed 3.61 tons per rolling, 12-month period.

Emissions of PE/PM10 from this emission unit shall not exceed 0.18 ton per rolling, 12-month period.

Applicable Compliance Methods

Emissions from asphalt load out and silo filling operations are calculated as follows:

Asphalt plant silo filling and plant load out Emission Factors based on AP-42, Fifth Edition, Table 11.1-14, dated 3/2004.

Known:

V = -0.5 Asphalt volatility factor (default); T = 325 HMA mix temp (F) (default)

For silo filling, 1.4 per cent of TOC is not VOC AP-42 Table 11.1-16 dated 3/2004



For plant load out, 7.3 per cent of TOC is not VOC AP-42 Table 11.1-16  
dated 3/2004

<u>Activity</u>	<u>Pollutant</u>	<u>Predictive Emission Factor Equation, lb/ton</u>
Silo filling	PE	$EF=0.000332+0.00105(-V)e^{((0.0251)(T+460)-20.43)}$
Load out	PE	$EF=0.000181+0.00141(-V)e^{((0.0251)(T+460)-20.43)}$
Silo filling	VOC	$EF= [0.0504(-V)e^{((0.0251)(T+460)-20.43)}] \times (1-0.014)$
Load out	VOC	$EF= [0.0172(-V)e^{((0.0251)(T+460)-20.43)}] \times (1-0.073)$
Silo filling	CO	$EF=0.00488(-V)e^{((0.0251)(T+460)-20.43)}$
Load out	CO	$EF=0.00558(-V)e^{((0.0251)(T+460)-20.43)}$

Based on the above information, the emission factors and emissions are as follows.

<u>Activity</u>	<u>Pollutant</u>	<u>lb/ton</u>	<u>tons/yr (at 600,000 tons/yr production)</u>
Silo filling	PE	$5.86 \times 10^{-4}$	0.18
Load out	PE	$5.22 \times 10^{-4}$	0.16
Silo filling	VOC	$1.20 \times 10^{-2}$	3.61
Load out	VOC	$3.86 \times 10^{-3}$	1.16
Silo filling	CO	$1.18 \times 10^{-3}$	0.35
Load out	CO	$1.35 \times 10^{-3}$	0.41

The PM10 emissions are assumed equivalent to the PE.

e. Emission Limitation

Visible particulate emissions from the stack shall not exceed 10 per cent opacity, as a six-minute average.

Visible emissions of fugitive dust (from areas other than the enclosures for the rotary drum and the hot mix asphalt elevator) shall be less than or equal to 10 per cent opacity, as a 3-minute average.

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

f. Emission Limitation

There shall be no visible emissions of fugitive dust from the enclosures for the rotary drum and the hot mix asphalt elevator.

Applicable Compliance Method

Compliance with the visible emissions limitation for the fugitive dust identified in this permit shall be determined in accordance with U.S. EPA Method 22.

- (2) The concentrations of contaminants (arsenic, barium, cadmium, chromium, lead, mercury, PCBs, and total halogens) in the used oil shall be analyzed using a "total constituent analysis" method, as specified in U.S. EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods." The applicable test methods that should be used are as follows:

Arsenic, barium, cadmium, chromium, and lead: SW-846, Method 3031 or 3051 (digestion procedures) followed by analysis using Method 6010B or 6020;  
Mercury: SW-846, Method 7471A;

PCBs: SW-846, Method 8270C or 8082; and

Total halogens: SW-846, Method 9075, 9076, or 9077.

The permittee shall submit a written request and receive approval from Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control, of Central Office, before an alternative test method, not listed above, can be used for the total constituent analysis of the above-mentioned used oil contaminants.

## g) Miscellaneous Requirements

- (1) None.