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Facility Name: **Barrett Paving Materials Inc**

Application Number: **14-4660**

Date: **Draft PTI (date will be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

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BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Barrett Paving Materials Inc**Application Number: **14-4660**Date: **Draft PTI (date will be entered upon final issuance)**AIR EMISSION SUMMARY

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

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P902 Mod	410 TPH asphaltic concrete batch plant with cyclone and fabric filter	Use of a fabric filter; compliance with usage and emissions limits Aggregate unloaded to the cold storage bins shall have a moisture content sufficient to minimize or eliminate visible emissions from the screen and transfer point to the dryer	40 CFR Subpart I 3745-15-07 3745-17-07 (A)(1)* 3745-17-11 (B)* 3745-31-05 (BAT)	0.04 grain PM- PM ₁₀ /dscf See Additional Special Term and Condition F.1. Less stringent Less stringent 9.2 pounds PM/hour (stack), 8.2 pounds PM/hour (fugitive), 11.47 TPY PM (total)**; 3.1 pounds PM ₁₀ /hr (stack), 8.2 pounds PM ₁₀ /hour (fugitive), 8.1 TPY PM ₁₀ (total)** 139.4 pounds CO/hour, 99.45 TPY CO**; 69.7 pounds NO _x /hour,

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P902 Mod Cont'd				27.69 TPY NO _x **; 98.4 pounds SO ₂ /hour, 34.48 TPY SO ₂ ** 18.9 pounds OC/hour, 9.05 TPY OC**; 0.039 pound arsenic/hour; 0.013 TPY arsenic**; 0.016 pound cadmium/hour, 0.005 TPY cadmium**; 0.078 pound chromium/hour; 0.027 TPY chromium**; 0.779 pound lead/hour, 0.267 TPY lead**; 0.389 pound PCB's/hour, 0.133 TPY PCB's**; 0.057 pound HCl/hour, 0.019 TPY HCl**; 0.008 pound mercury/hour; 0.003 TPY mercury**

* The emissions limitation established by this rule is less stringent than those established by OAC rule 3745-31-05(BAT).

* Compliance with the tons per year emission limits shall be demonstrated by rolling, 12-month summations.

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	9.05
PM	11.47
SO ₂	34.48
NO _x	27.69
CO	99.45
PM ₁₀	8.1

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P902	410 TPH asphaltic concrete batch plant	I

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

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

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

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Reports are to be sent to:

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

and **Hamilton County Dept. of Env. Services**
1632 Central Parkway
Cincinnati, OH 45210

REPORTING REQUIREMENTS

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

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

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

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

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AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

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

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. For lbs/hr and TPY emissions limitations see the Air Emissions Summary Page of this permit.
2. All recycled, used oil burned in emissions unit P902 shall meet the following specifications:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	50 ppm, maximum
total halogens	4000 ppm maximum
mercury	1 ppm, maximum
flash point	100 degrees Fahrenheit, minimum
heat content	135,000 Btu/gallon, minimum

Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR Part 266.40(c) and OAC

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rule 3745-58-50. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the supplier ["marketer" in 40 Part CFR 266.43(a)] has demonstrated to the Ohio EPA's Division of Solid and Hazardous Waste Management that the used oil does not contain any hazardous waste.

3. Visible particulate emissions from any stack associated with emissions unit P902 shall not exceed 10% percent opacity, as a six-minute average, except as specified by rule.
4. Visible particulate emissions from any fugitive dust emissions point associated with emissions unit P902 shall not exceed 20% percent opacity, as a three-minute average.
5. The drop height of the front end loader bucket shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from the cold feed bins and recycled material (RAP) bin.
6. The aggregate loaded into the storage bins shall have a moisture content sufficient to minimize or eliminate the visible emissions of fugitive dust from the elevator and the transfer point to the dryer.

B. Operational Restrictions

1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, the pressure drop across the baghouse shall be maintained within the range of pressure drop in inches of water established during the most recent emission test that demonstrated that the emissions unit was in compliance while the emissions unit is in operation.
2. The maximum annual asphalt production rate for emissions unit P902 shall not exceed 585,000 tons per year based upon a rolling, 12-month summation of the production rates. To ensure enforceability during the first 12 calendar months of operation following the startup of the modified emissions unit P902, the permittee shall not exceed the production levels specified in the following table:

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

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

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

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

After the first 12 calendar months of operation following the startup of the modified emissions unit P902,

compliance with the annual asphalt production rate limitation using oil shall be based upon a rolling, 12-month summation of the asphalt production rates using oil.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. the date of shipment or delivery;
 - b. the quantity of used oil received;
 - c. the Btu value of the used oil, in BTU/gallon;
 - d. the flash point of the used oil in degrees Fahrenheit;
 - e. the arsenic content, in ppm;
 - f. the cadmium content, in ppm;
 - g. the chromium content, in ppm;
 - h. the lead content, in ppm;
 - i. the PCB content, in ppm;
 - j. the total halogen content, in ppm; and,
 - k. the mercury content, in ppm.

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

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

4. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created, unless otherwise specified in this permit. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).
2. The permittee shall furnish the Administrator written notification as follows:

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

pressure drop across the baghouse did not comply with the allowable range specified in Term B.1.

4. The permittee shall notify the USEPA and the Ohio EPA if any of the used oil exceeds the used oil specifications. An identification number from USEPA shall be obtained prior to the combustion of any used oil. Before the permittee accepts the first shipment of any off-specification used oil from a marketer, the permittee must provide the marketer a one-time, written and signed notice certifying that:
 - a. the company has notified USEPA of its used oil management activities and that the notice included the location and description of those activities; and,
 - b. the company will burn the used oil only in an industrial furnace or boiler identified in 40 CFR Part 266.41(b) and OAC rule 3745-58-42.

A copy of each certification notice that the permittee sends to a marketer must be kept on file for a minimum of 5 years from the date it last received off-specification used oil from that marketer.

5. The permittee shall submit annual reports which specify the asphalt production rate (in tons), asphalt production rate using oil in the drum dryer burner (in tons) and the PM, NO_x, SO₂ and CO emissions for emissions units P902 for the previous calendar year. For the first 12 calendar months following the startup of the modified emissions unit P902, these reports shall include the cumulative asphalt production rate and cumulative asphalt production rate using oil for each calendar month in the reporting period. Beginning after the first 12 calendar months following the startup of the modified emissions unit P902, these reports shall include the rolling, 12-month summation of asphalt production rate and asphalt production rate using oil for each calendar month in the reporting period. These reports shall be submitted by January 31 of each year.

E. Compliance Methods/Testing Requirements

1. Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial startup of the emissions unit, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in

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order to demonstrate compliance with the allowable mass emission rate(s) for particulate matter(PM) and organic compounds (OC). The PM test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A and the OC test(s) shall be conducted in accordance with the test methods and procedures specified in Method 25 (or suitable equivalent) of 40 CFR Part 60, Appendix A while the emissions unit is operating at or near maximum capacity and using only virgin aggregate.

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

Personnel from the Hamilton County Dept. of Env. Services shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the emissions test unless visibility or other conditions prevent the opacity observations from being conducted concurrently with the emissions test. In such a case, the permittee shall reschedule the opacity observations as soon after the emissions test as possible, but not later than 30 days thereafter, and shall advise the Administrator of the rescheduled date.

In these cases, the 30-day prior notification to the Administrator required in 40 CFR 60.7(a)(6) shall be waived. The rescheduled opacity observations shall be conducted (to the extent possible) under the same operating conditions that existed during the emissions test. The visible emissions observer shall determine whether visibility or other conditions prevent the opacity observations from being made concurrently with the initial performance test in accordance with procedures contained in Method 9, 40 CFR Part 60, Appendix B. Opacity readings of portions of plumes which contain condensed, uncombined water vapor shall not be

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used for purposes of determining compliance with opacity standards. The owner or operator of an affected facility shall make available, upon request by the Administrator, such records as may be necessary to determine the conditions under which the visual observations were made and shall provide evidence indicating proof of current visible observer emission certification.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

2. Compliance with the PM, PM₁₀, CO, NO_x, OC, and SO₂ emissions limits on the Air Emissions Summary page of this permit shall be demonstrated by the recordkeeping in Additional Special Term and Condition C.3 and the following:
 - a. when using natural gas, the emission factors for CO, NO_x, and SO₂ from Compilation of Air Pollution Emission Factors (AP-42), Tables 11.1-2 and 11.1-7, Fifth Edition;
 - b. when using used oil, the emission factors for PM, CO, NO_x, OC, and SO₂ from Compilation of Air Pollution Emission Factors (AP-42), Tables 11.1-2 and 11.1-7, Fifth Edition;
 - c. for PM₁₀ emissions from the stack, the emission factors from Compilation of Air Pollution Emission Factors (AP-42), Table 11.1-3, Fifth Edition; Summary of Particle Size Distribution;
 - d. for fugitive emissions from materials unloading to the cold storage feed bins and the recycled material (RAP) bin, the emission factors for PM/PM₁₀ from RACM Table 2.21-1; and,
 - e. for PM and OC from the exhaust stack, the results of the emission testing will be used to demonstrate compliance.
3. Compliance with the HAPs emissions limitations on the Air Emissions Summary Page of this permit shall be demonstrated by the recordkeeping in Additional Special Terms and Conditions C.2 and C.3, the density of the oil, and the conversion factor 2.3 gallons of oil used per ton of asphalt produced (supplied by the facility).

4. Compliance with the used oil specifications in Additional Special Term and Condition A.2 shall be demonstrated by the recordkeeping in Additional Special Term and Condition C.2.
5. Compliance with the annual asphalt production limitations in Additional Special Term and Condition B.2 shall be demonstrated by the record keeping in Additional Special Term and Condition C.3.
6. Compliance with the annual asphalt production limitation when using oil in the drum dryer burner in Additional Special Term and Condition B.3 shall be demonstrated by the recordkeeping in Additional Special Term and Condition C.3.
7. Compliance with the visible emissions limitations in Additional Special Terms and Conditions A.3 and A.4 shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

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