

Mr. Ron Terrell
Milestone Contractors, L.P.
5950 South Belmont Avenue
Indianapolis, IN 46217

Re: **SMF 177-10239**
First Significant Modification to
FESOP 177-6139-03248

Dear Mr. Terrell:

Milestone Contractors, L.P. was issued a permit on December 9, 1996 for a hot mix asphalt source. A letter requesting a change to this permit was received on October 13, 1998. Pursuant to the provisions of 326 IAC 2-8-11 a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of a the following:

1. A relaxation of the PM₁₀ emission limit for the aggregate drum mix dryer. The PM₁₀ emission limit shall change from 10.7 pounds per hour to 17.4 pounds per hour.
2. A correction of the source's limited potential to emit (PTE) for PM and PM₁₀. The PTE for PM shall change from 193.71 tons per year to 136.24 tons per year. The PM₁₀ shall change from 62.4 tons per year to 99.0 tons per year.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, of my staff, at the above address; or by phone at 317-233-6875 or 1-800-451-6027 (ext 3-6875).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Wayne County
U.S. EPA, Region V
Wayne County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**Milestone Contractors, L.P.
6061 State Road 121
Richmond , Indiana 47374**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F177-6139-03248	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 9, 1996
First Significant Permit Modification: SMF177-10239	Pages Affected: 23
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) one (1) aggregate drum mix dryer, identified as emission unit No. 2, with a maximum capacity of 300 tons per hour, equipped with one (1) re-refined waste oil fired aggregate dryer burner with a maximum rated capacity of 109 million (MM) Btu per hour using No. 2 distillate fuel oil as a back-up fuel and one (1) baghouse for air pollution control, exhausting at one (1) stack, identified as S-1; and
- (b) one (1) drag slat conveyor, one (1) RAP conveyor, two (2) feeder conveyors, and one (1) screen.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3] [326 IAC 12] [40 CFR Part 60.90]

D.1.1 Particulate Matter

State: Pursuant to 326 IAC 6-3 (Process Operations) and 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate matter emissions from the aggregate mixing and drying operation shall not exceed 23.1 lbs/hour.

Federal: Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf).

D.1.2 Particulate Matter 10 Microns (PM-10)

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 17.4 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.3 Opacity

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the mixing and drying operations shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20 percent opacity or greater.

D.1.4 Sulfur Dioxide (SO₂)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 109 million Btu per hour burner for the aggregate dryer shall be limited to 1.6 pounds per million Btu heat input or a sulfur content of less than or equal to 1.31 percent when using re-refined waste oil.

This source has accepted a sulfur content limit of 0.75 percent when using re-refined waste oil. When using distillate oil, the sulfur dioxide emissions from the 109 million Btu per hour burner for the aggregate dryer shall be limited to 0.5 pound per million Btu heat input or a sulfur content of less than or equal to 0.49 percent.

Pursuant to 326 IAC 7-1.1-2, this sulfur dioxide limit applies at all times including periods of startup, shutdown, and malfunction.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document for First Significant Permit Modification of the Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Milestone Contractors, L.P.
Source Location: S.R. 121 and Porterfield Road, Richmond, Indiana 47374
County: Wayne
Permit No.: F177-6139-03248 Issued: December 9, 1996
Revision No. SMF-177-10239
SIC Code: 2951
Permit Reviewer: Nysa L. James

History

On October 13, 1998, Milestone Contractors, L.P. was issued a FESOP, F-177-6139-03248. The following changes shall be considered a First Significant Modification to the existing FESOP source.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Milestone Contractors, L.P. relating to the requested revision of their FESOP and is proposing the following changes:

1. Upon further review OAM has determined that the original PM₁₀ limit established under Section D.1.1, located on page 23 of 33, was calculated incorrectly. Therefore, Condition D.1.2, Particulate Matter 10 Microns (PM-10), is amended to the following (changes are bolded and crossed out for emphasis):

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operations shall not exceed ~~40.7~~ **17.4** pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.
2. The source submitted revised unpaved road emission calculations. The Office of Air Management (OAM) has reviewed and verified those calculations to be correct. Based on the modified calculations, the source's potential to emit of PM shall decrease from 193.71 tons per year to 136.24 tons per year. The potential to emit of PM₁₀ from unpaved roads shall decrease from 51.0 tons per year to 21.94 tons per year. The revised Limited PTE table, located on page 4 of 13 of the technical support document, is amended under # 3.
3. Based on the revised PM₁₀ emission limit established under D.1.2, the limited potential to emit of PM₁₀ shall increase from 62.4 tons per year to 99.0 tons per year. The Limited PTE table, located on page 4 of 13 of the technical support document, is amended to the following (changes are bolded and crossed out for emphasis):

	Limited PTE (tons/year)						
Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
combustion	0.09	0.07	90.80	0.82	6.58	26.31	2.5e-04
aggregate mix dryer, aggregate burner drying	45.94 67.3	10.40 76.25	0.00 90.80	0.13 8.95	0.00 6.58	0.00 26.31	8.13
bin loading & conveying conveying and handling	0.4 5.65	0.19 0.57	0.00	0.00	0.00	0.00	0.00
screening & batch drops	1.16	0.55	0.00	0.00	0.00	0.00	0.00
unpaved roads	145.73 62.7	51.00 21.94	0.00	0.00	0.00	0.00	0.00
storage	0.16 0.35	0.05 0.11	0.00	0.00	0.00	0.00	0.00
cold mix VOC storage	0.00	0.00	0.00	90.01	0.00	0.00	0.00
insignificant sources	0.24	0.13	8.20	0.04	0.59	2.38	0.00
Total Emissions	193.71 136.24	62.4 99.00	99.00	99.00	7.17	28.69	8.13

Enforcement Issue

None

Recommendation

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

Emissions Calculations

The potential to emit (PTE) of PM₁₀ was re-calculated based on the original information submitted in the FESOP application.

PM_{10} PTE (aggregate mix dryer and burner) = 99 ton/yr - sum of PTE from all other activities (including insignificant) = 99 ton/yr - [(0.13 ton/yr (insignificant) + 0.57 (conveying/handling) ton/yr + 21.94 (unpaved roads) ton/yr + 0.11 (storage) ton/yr)] = 99 ton/yr - 22.75 ton/yr = **76.25 ton/yr**.

76.25 ton/yr * 1 yr/8760 hr * 2000 lb/ton = **17.4 lb/hr**.

Total Potential and Allowable Emissions

See Technical Support Document of original FESOP.

Federal Rule Applicability

There are no changes in Federal rule applicability from the original FESOP.

State Rule Applicability

There are no changes in State rule applicability from the original FESOP.

Compliance Monitoring

1. Daily visible emission notations of the conveyors, transfer points, aggregate storage piles, unpaved roads, and the mixing and drying operation stack exhaust, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shutdown time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain trouble shooting contingency and corrective actions for when an abnormal emission is observed.
2. The Permittee shall take readings of the total static pressure drop across the baghouse controlling the mixing and drying operation, at least once a day when the mixing and drying process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 8.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.11 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

3. A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this source.
4. The following inspections shall be performed when the mixing and drying operation is operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily (before starting production)

- (a) Drain water from baghouse air compressor tank(s) and or reservoir(s).
- (b) Drain water from water traps in air line.
- (c) Check baghouse air compressor for proper operation and air pressures.
- (d) Check exhaust fan and screw conveyor drives for proper operations.
- (e) Check damper for proper operation (i.e. opens and closes freely).
- (f) Preheat the baghouse per the manufacturer's instructions to dry out the bags.

Daily (while plant is in production)

- (a) Monitor pressure drops across filter.
- (b) Check exhaust plume for visible emissions.
- (c) Monitor inlet temperatures to baghouse.

Daily (after production is finished)

- (a) Pulse the bags clean.
- (b) Drain water from all trap(s), air tank(s), and reservoir(s).

Weekly (during operating season)

- (a) Check compressed air system for leaks.
- (b) Check duct work and baghousing for holes and air leaks.

Monthly (during operating season)

- (a) Check filter bags visually for leaks.
- (b) Check screw conveyor hanger bearings for wear and proper operations.
- (c) Check filter pulse system for proper operation.
- (d) Check exhaust fan drive belt tension.

Yearly (during the off season)

- (a) Check condition of bags to determine useful life remaining in bags.
- (b) Check baghouse structure and duct work for rust and worn places in steel.

Appropriate corrective actions shall be taken in accordance with Condition C.12.

5. Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted. The Permittee shall analyze the oil sample to determine the sulfur content of the oil in accordance with 326 IAC 3-3-4.. If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling. Vendor analysis of the fuel oil is acceptable, in lieu of the above, if accompanied by a certification.

Air Toxic Emissions

There are no changes in the air toxic emissions due to this modification.

Conclusion

The modification of this source will be subject to the conditions of the attached proposed **FESOP Significant Modification Permit No. SMF-177-10239-03248**.

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document for the First Significant FESOP Modification

Source Name: Milestone Contractors, L.P.
Source Location: 6061 State Road, Richmond, IN. 47374
County: Wayne
Significant Modification No.: SMF-177-10239-03248
SIC Code: 2951
Permit Reviewer: Nysa L. James

On November 10, 1998, the Office of Air Management (OAM) had a notice published in the Palladium Item, Richmond, Indiana, stating that Milestone Contractors, L.P. had applied for a modification to the existing FESOP (F-177-6139-03248), issued on December 9, 1998. The notice also stated that OAM proposed to issue a permit for this modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes (changes are bolded and crossed out for emphasis):

1. The address of the source is revised to the following (changes are bolded and crossed out for emphasis):

Milestone Contractors, L.P.
~~S.R. 121 and Porterfield Road~~ **6061 State Road 121**
Richmond , Indiana 47374