

Mr. Steve Henderson
E&B Paving, Inc.
286 West 300 North
Anderson, Indiana 46012

Re: SMF 053-10387
First Significant Modification to FESOP 053-7779
Plt ID 053-03250

Dear Mr. Henderson:

E&B Paving was issued a Federally Enforceable State Operating Permit (FESOP No. 053-7779-03250) on June 5, 1997, for a portable hot mix asphalt plant. On November 17, 1998, the Office of Air Management (OAM) received a letter requesting that modifications be made to the FESOP to change the operation status of the plant to stationary.

Based on the written request from E&B Paving and pursuant to the provisions of 326 IAC 2-8-11 (FESOP: Permit Modification), a significant modification to the FESOP is hereby approved as discussed in the attached Technical Support Document and as described herein (bold emphasis added to new language):

1. The company description and location information on the cover page of the FESOP shall be revised to list the source's permanent address as follows:

E & B Paving, Inc.
(Portable)
3888 S. Garthwaite Road
Marion, Indiana 46953

2. The header at the top of the FESOP pages 2 through 30 shall be revised to replace the portable designation with the permanent location of Marion, Indiana. This correction will be made on all replacement permit pages included with this Significant Modification to the FESOP, and should be made on all other pages by the permittee.
3. The source description in item A.1 (General Information) of Section A on Page 4 of 30 of the FESOP shall be changed to designate the source as stationary, specify the source's new permanent address, and change the mailing address for the source as follows:

A.1 General Information

The Permittee owns and operates a ~~portable~~ **stationary** hot mix drum asphalt manufacturing source.

Responsible Official: Steve Henderson

Source Address: ~~Portable~~ **3888 S. Garthwaite Road, Marion, Indiana, 46953**

Mailing Address: ~~5342 Elmwood Suite A, Indianapolis, Indiana 46203~~
286 West 300 North, Anderson, Indiana, 46012

4. The first sentence in item A.2 (Emission Units and Pollution Control Summary) of Section A on Page 4 of 30 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

A.2 Emission Units and Pollution Control Summary

This ~~portable~~ **stationary** source consists of the following emission units and pollution control devices:

5. The first sentence in item A.3 of Section A on Page 4 of 30 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

A.3 Insignificant Activities

This ~~portable~~ **stationary** source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

6. The first sentence in item A.4 (FESOP Applicability) of Section A on Page 4 of 30 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

A.4 FESOP Applicability [326 IAC 2-8-2]

This ~~portable~~ **stationary** source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

7. Items (a) and (b) of Condition C.2 (Opacity) on Page 15 of 30 of the FESOP shall be modified to reflect the appropriate average opacity limitation for attainment counties as follows:

(a) ~~Visible emissions Opacity~~ shall not exceed an average of ~~thirty percent opacity~~ **40%** in ~~twenty-four (24) consecutive readings~~ **any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4,**

(b) ~~Visible emissions Opacity~~ shall not exceed ~~sixty percent opacity~~ **60%** for more than a cumulative total of ~~fifteen (15) minutes~~ **(sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

8. Condition C.5 (Fugitive Particulate Matter Emission Limitations) on Page 15 of 30 of the FESOP shall be removed from the permit because the rule no longer applies to the source.

9. Condition C.21 (Relocation of Portable Sources) on Page 21 of 30 of the FESOP shall be removed from the permit because the source will no longer be considered portable.
10. Condition D.1.4 (Particulate Matter) on Page 23 of 30 of the FESOP shall be revised as follows replacing the 326 IAC 6-1-2 language with the appropriate limitations from 326 IAC 6-3-2 (Particulate Emissions Limitations):

D.1.4 Particulate Matter (PM)

~~Pursuant to the 326 IAC 6-1, particulate matter emissions from the aggregate dryer/mixer shall not exceed 0.030 grains per dry standard cubic foot (0.20 pounds per hour)~~ Pursuant to 326 IAC 6-3-2, particulate matter emissions from the asphalt plant shall not exceed 63.0 pounds per hour established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour;} \\ P = \text{process weight rate in tons per hour} \end{array}$$

~~and pursuant to New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I), visible emissions from the plant shall not exceed 20 percent opacity. Compliance with these limits will also satisfy 326 IAC 6-1 and 326 IAC 5-1.~~

11. Condition D.1.5 (Particulate Matter) shall be added to Page 23 of 30 of the FESOP to separate and clarify the applicable requirements of New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I). The new condition is as follows and all subsequent conditions in Section D.1 shall be renumbered as appropriate:

D.1.5 Particulate Matter (PM)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I):

- (a) **particulate matter emissions from the asphalt plant shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), and**
- (b) **the visible emissions from the plant shall not exceed 20 percent opacity.**

Compliance with part (a) of this condition will satisfy the requirements of 326 IAC 6-3 (Particulate Emission Limitations).

12. The particulate matter less than 10 microns in diameter (PM10) limit specified in Condition D.1.5 (renumbered D.1.6) on Page 23 of 30 of the FESOP (moved to Page 24) shall be changed to 17.28 pounds per hour based on the change from portable to stationary. This new pound per hour limitation will ensure that the PM10 PTE does not exceed 99 tons per year. The condition shall be revised as follows:

D.1.6 Particulate matter less than 10 microns (PM-10)

Pursuant to 326 IAC 2-8-4, fine particulate matter emissions from the aggregate dryer/mixer shall not exceed ~~2.49~~ 17.28 pounds per hour. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

13. Pages 24 and 25 of 30 of the FESOP have been reformatted to make space for the changes on Page 23 of the permit. Except for being renumbered, none of the existing conditions have changed on these pages.
14. The source address in the certification, deviation and quarterly report forms included as Pages 27 through 30 of the FESOP has been revised to reflect the sources permanent address instead of portable.

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 FESOP.

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 Janusz Johnson, OAM at the above address; or by phone at 317-232-8325 or 1800-451-6027 (dial "0" and ask for ext. 2-8325).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

JKJ

Attachments: TSD - 4 pages
Modified FESOP pages - 11 pages

cc: File - Grant County
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

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

**E & B Paving, Inc.
3888 S. Garthwaite Road
Marion, Indiana 46953**

(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 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR 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.: F 053-7779-03250	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 5, 1997
First Significant Modification: SMF 053-10387	Pages Affected: title, 4, 15, 21, 23, 24, 25, 27, 28, 29 and 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a stationary hot mix drum asphalt manufacturing source.

Responsible Official: Steve Henderson
Source Address: 3888 S. Garthwaite Road, Marion, Indiana, 46953
Mailing Address: 286 West 300 North, Anderson, Indiana, 46012
SIC Code: 2951
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program
Minor Source, PSD Program

A.2 Emission Units and Pollution Control Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) hot mix drum mixer exhausting through stack SV-1, equipped with a baghouse for particulate matter control, capacity: 300 tons per hour.
- (b) One (1) 109 million British thermal units per hour burner firing natural gas as a primary fuel and #2 distillate oil as backup fuel also exhausting through stack SV-1.
- (c) One (1) 2.353 million British thermal units per hour hot oil heater firing natural gas as a primary fuel and #2 distillate oil as backup fuel exhausting through stack SV-2.
- (d) Two (2) liquid asphalt storage tanks exhausting at vents SV-3 and SV-4, capacity: 20,000 gallons, each.
- (e) One (1) storage tank for #2 distillate oil venting at SV-5, capacity: 15,000 gallons.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Paved and unpaved roads and parking lots with public access.
- (b) Four (4) aggregate storage bins.
- (c) One (1) recycled aggregate storage bin.
- (d) Three (3) storage piles, total capacity: 18,000 tons.
- (e) Materials testing laboratory.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the conditions of all construction and operating permits issued under 326 IAC 2 prior to the effective date of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed ninety-nine (99) tons per three hundred sixty five (365) day period. Emissions of hazardous air pollutants (HAPs) from the entire source shall not exceed nine (9) tons per three hundred sixty five (365) day period of any individual HAP or twenty-four (24) tons per three hundred sixty five (365) day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of 40% in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed 60% for more than a cumulative total of 15 minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

C.5 **THIS CONDITION HAS BEEN REMOVED**

C.6 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-5-2 the permittee shall not allow the use of asphalt emulsion containing more than 7 percent oil distillate by volume of emulsion, except as used for the following purposes:

- (a) penetrating prime coating,
- (b) stockpile storage mix, and

- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing the date of issuance of this permit and ending on the last day of the reporting period.

C.21 **THIS CONDITION HAS BEEN REMOVED**

D.1.3 Nitrogen Oxides (NO_x)

- (a) Pursuant to 326 IAC 2-8-4, the total input of natural gas to the aggregate dryer burner and the hot oil heater shall be limited to 360.0 million cubic feet per year as distributed by month shown in the table in D.1.3(b). This fuel usage limitation was taken voluntarily by the company and is equivalent to nitrogen oxides emissions of 99.0 tons per year.
- (b) Pursuant to 326 IAC 2-8-4, the total usage of natural gas shall be limited to the following monthly levels:

Month	Usage Limit (Million Cubic Feet Per Month)
January	2.07
February	2.07
March	2.49
April	17.80
May	25.88
June	39.54
July	44.09
August	69.97
September	68.52
October	41.40
November	33.33
December	12.84
Total	360.00

For purposes of determining compliance based on NO_x emissions, each 1000 gallons of #2 distillate oil burned shall be equivalent to 0.036 million cubic feet of natural gas. This fuel usage limitation was taken voluntarily by the company and is equivalent to NO_x emissions of 99.0 tons per year. Due to this limit, the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, particulate matter emissions from the asphalt plant shall not exceed 63.0 pounds per hour established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour;} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.1.5 Particulate Matter (PM)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I):

- (a) particulate matter emissions from the asphalt plant shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), and
- (b) the visible emissions from the plant shall not exceed 20 percent opacity.

Compliance with part (a) of this condition will satisfy the requirements of 326 IAC 6-3 (Particulate Emission Limitations).

D.1.6 Fine Particulate Matter (PM₁₀)

Pursuant to 326 IAC 2-8-4, fine particulate matter emissions from the aggregate dryer/mixer shall not exceed 17.28 pounds per hour. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.7 Particulate Matter

During the period between 60 days and 360 days after issuance of this permit, the Permittee shall perform PM and PM₁₀ testing utilizing methods per approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀.

D.1.8 Fuel Oil Sampling and Analysis

Oil samples shall 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 is required upon filling. Vendor analysis of each load delivered is acceptable, in lieu of the above, if accompanied by a certification.

Compliance Assurance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.9 Pressure Readings

The Permittee shall take pressure rate readings from the baghouse controlling the aggregate drying operation, at least once per shift when the dryer is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the scrubber shall be maintained within the range of 3.0 and 5.0 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 the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.10 Daily Visible Emission Notations

Visible emission notations of the conveyers, material transfers, aggregate storage piles, unpaved roads, and the mixing and drying operation stack exhaust shall be performed once per day. 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 shut down time. In the case of drum 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 troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.11 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for these facilities.

D.1.12 Periodic Emissions Testing

The Permittee shall perform particulate emissions testing on the drum mixer/dryer and burner every 5 years in accordance with IDEM requirements.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.13 Production Rate

The Permittee shall maintain monthly records at the source of the following values:

- (a) Amount of liquid binder used in the production of cold mix cutback asphalt; and
- (b) Average diluent content of the liquid binder.

D.1.14 Operational Parameters

The Permittee shall maintain monthly records at the stationary source of the following values:

- (a) Amount of each fuel used;
- (b) The records for fuel oil shall contain a minimum of the following:
 - (1) Average sulfur content of any fuel oil used;
 - (2) Average higher heating value of any fuel oil used;
 - (3) Average sulfur dioxide emission rate (expressed in pounds per million British thermal unit);
 - (4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
 - (5) Regular fuel sampling and analysis performed as specified in 326 IAC 3-3-4, or fuel supplier certifications containing, as a minimum, the following:
 - (A) The name of the oil supplier;
 - (B) A statement from the oil supplier that certifies the sulfur content of the fuel oil; and
 - (C) The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

D.1.15 Quarterly Reporting

Quarterly summary to document compliance with operation condition numbers D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. These reports shall include the amounts of each fuel used each month and the fuel oil's average sulfur content in the quarter. All records and reports shall use calendar months. Records of sulfur content and higher heating value shall be determined by information as obtained by the vendor.

E & B Paving, Inc.
Marion, Indiana
Permit Reviewer: MES

First Significant Modification SMF: 053-10387
Reviewer: Janusz Johnson

Page 27 of 30
OP No. F 053-7779-03250

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: E & B Paving, Inc.
Source Address: 3888 S. Garthwaite Road, Marion, Indiana, 46953
FESOP No.: F 053-7779-03250

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 DEVIATION OCCURRENCE REPORT
 (For Control Equipment Monitoring Only)**

Source Name: E & B Paving, Inc.
 Source Address: 3888 S. Garthwaite Road, Marion, Indiana, 46953
 FESOP No.: F 053-7779-03250

A separate copy of this report must be submitted for each monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
9 No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.	
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT**

Source Name: E & B Paving, Inc.
Source Address: 3888 S. Garthwaite Road, Marion, Indiana, 46953
FESOP No.: F 053-7779-03250

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: E & B Paving, Inc.
 Source Address: 3888 S. Garthwaite Road, Marion, Indiana, 46953
 FESOP No.: F 053-7779-03250
 Facilities: One (1) 109 million British thermal units per hour burner firing natural gas as a primary fuel and # 2 distillate oil as backup fuel
 One (1) 2.353 million British thermal units per hour hot oil heater firing natural gas as a primary fuel with #2 distillate oil as backup fuel
 Parameters: Sulfur dioxide and nitrogen oxides
 Limits: #2 oil = 2,828,571 gallons per year & nat. gas = 360.0 million cubic feet (see below)
 Equivalent to total source SO₂ and NO_x emission of 99.0 tons per year, each

Year: _____

Month	#2 Oil Throughput Limits (Gallons)	#2 Oil Usage (Gallons)	Average Sulfur Content (%)	Natural Gas Limit (MMCF)	Natural Gas Usage (MMCF)	Gas Equivalent (0.000036 x #2 Oil Usage) (MMCF)
January	16,266			2.07		
February	16,266			2.07		
March	19,518			2.49		
April	139,883			17.80		
May	203,319			25.88		
June	310,670			39.54		
July	346,455			44.09		
August	549,776			69.97		
September	538,388			68.52		
October	325,310			41.40		
November	261,874			33.33		
December	100,846			12.84		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Modification (SMF) to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	E&B Paving
Source Location:	3888 S. Garthwaite Road, Marion, Indiana, 46953
County:	Grant
SIC Code:	2951
Significant Modification No.:	SMF-053-10387
Permit Reviewer:	Janusz Johnson

E&B Paving was issued a Federally Enforceable State Operating Permit (FESOP No.053-7779-03250) on June 5, 1997, for a portable hot mix asphalt plant. On November 17, 1998, the Office of Air Management (OAM) received a letter requesting that modifications be made to the FESOP to change the operation status of the plant to stationary.

Permitted Emission Units and Pollution Control Equipment

There will be no change to the permitted emission units and pollution control devices at this source as a result of the proposed significant modification to the FESOP.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

There will be no change to the insignificant activities at this source as a result of the proposed significant modification to the FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the significant modification to the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application for the FESOP and additional information submitted by the applicant.

A letter requesting the significant modification for the purposes of this review was received on November 17, 1998.

Emission Calculations

There are no new emissions of regulated air pollutants associated with this change. However, the potential to emit particulate matter (PM) from the baghouse stack and particulate matter 10 microns in diameter or less (PM10) from the unpaved roads has changed due to changes in the applicability of the limiting state rules. These changes in rule applicability are further discussed in the State Rules section of this TSD and the revised PTE levels are reflected in the Limited Potential to Emit section, below.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units based on the source's revised stationary status:

Process/facility	Limited PTE (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NOx	HAPs
dryer/burner & hot oil heater	53.9	75.8	99.0	0.504	7.2	99.0	7.62
conveying/handling/ screening	56.9	5.7	-	-	-	-	-
storage piles *	0.08	0.03	-	-	-	-	-
unpaved roads *	50.4	17.6	-	-	-	-	-
cutback asphalt	-	-	-	0.0	-	-	-
Total Emissions	161.3	99.0	99.0	0.504	7.2	99.0	7.62

* For the purposes of Part 70 review, fugitive dust controls have not been included in this limited PTE table.

- (a) Because 326 IAC 6-1-2 (Particulate Limitations) will no longer apply to this stationary source (see below), the allowable particulate matter emissions from the aggregate mixer/dryer shall be determined from the applicability of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.90, Subpart I). Pursuant to this standard, emissions from the facility shall not exceed 0.04 grains per dry standard cubic foot, therefore:

$$\text{allowable PM (ton/yr)} = 0.04 \text{ gr/dscf} * 51000 \text{ acfm} * 528^\circ \text{ R}/(460+280^\circ \text{ F}) * (1-.016) * 525600 \text{ min/yr} * 1 \text{ lb}/7000 \text{ gr} * 1 \text{ ton}/2000 \text{ lb}$$

$$\text{allowable PM (ton/yr)} = 53.8 \text{ tons/yr}$$

- (b) The PM10 pound per hour limitation in Condition D.1.5 of the FESOP has been revised due to the change from portable to stationary. Therefore, to comply with FESOP significant levels the PM10 shall be limited to 17.28 pounds per hour which is the equivalent of 75.7 tons per year.

County Attainment Status

The stationary source is located in Grant County.

Pollutant	Status
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Grant County has been designated as attainment or unclassifiable for ozone.

Portable Source

E&B Paving has requested to modify the existing FESOP to exclude portability.

Federal Rule Applicability

There are no changes to the applicability of Federal Rules due to the proposed significant modification to the FESOP.

State Rule Applicability

The following changes to State Rule applicability are necessary due to the proposed significant modification to the FESOP:

326 IAC 5-1 (Opacity Limitations)

Because this asphalt plant will now be located permanently in an attainment county, the average opacity limitation shall be changed from thirty percent (30%) to forty percent (40%) opacity.

Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), Except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity shall meet the following:

- (a) Opacity shall not exceed an average of 40% in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed 60% for more than a cumulative total of 15 minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Limitations)

This rule no longer applies because the asphalt plant will be permanently located in an attainment county.

326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations)

This rule previously did not apply because its applicability was superceded by the applicability of 326 IAC 6-1-2. However, because 326 IAC 6-1-2 no longer applies, the process shall be limited by 326 IAC 6-3.

Therefore, pursuant to this rule no person shall operate a facility such that particulate matter is emitted in excess of the pound per hour limit calculated as follows according to part (c) of the rule:

for "P" less than 30 tons per hour: $E = 4.10 * P^{0.67}$

- or -

for "P" greater than 30 tons per hour:

$$E = 55.0 * P^{0.11} - 40$$

where: "E" is the emission rate limit in pounds per hour, and
"P" is the process throughput in tons per hour.

Based on the maximum throughput of 300 tons per hour for the asphalt mixer/dryer, particulate matter emissions from this facility shall not exceed 63.0 pounds per hour. Controlled PM emissions from the asphalt mixer/dryer are expected to be 4.2 pounds per hour. Therefore, the facility can comply with this rule.

326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

This rule no longer applies because the source will be located in an attainment county and preconstruction approval was obtained prior to December 13, 1985.

Compliance Requirements

There are no changes to the compliance monitoring or record keeping and reporting requirements for the source as a result of the proposed significant modification to the FESOP.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

There is no change in the potential to emit (PTE) hazardous air pollutants from the source as a result of the proposed significant modification to the FESOP.

Conclusion

The operation of this stationary hot mix asphalt plant shall be subject to the conditions of the attached proposed **Significant Modification to the FESOP No. SMF-053-10387**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: E&B Paving
 Source Location: 3888 S. Garthwaite Road, Marion, Indiana, 46953
 County: Grant
 SIC Code: 2951
 Significant Modification No.: SMF-053-10387
 Permit Reviewer: Janusz Johnson

On February 24, 1999, the Office of Air Management (OAM) had a notice published in the *Marion Chronicle Tribune*, Marion, Indiana, stating that E&B Paving had applied for a modification to a FESOP to change the operation status of the hot mix asphalt plant covered by the permit from portable to stationary. The notice also stated that OAM proposed to issue a permit for this installation 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.

On March 2, 1999, the IDEM, OAM, determined that the following changes were necessary to clarify the applicability and requirements of 40 CFR 60.90, Subpart I. These revisions do not add any new requirements or change any previous permit determinations (changes are bolded for emphasis):

1. Condition D.1.4 (Particulate Matter) on the revised Page 23 of the FESOP shall be further revised as follows to separate language pertaining to the NSPS, Subpart I, requirements:

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, particulate matter emissions from the asphalt plant shall not exceed 63.0 pounds per hour established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \text{ where } E = \text{rate of emission in pounds per hour;} \\ P = \text{process weight rate in tons per hour}$$

~~and pursuant to New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I), visible emissions from the plant shall not exceed 20 percent opacity.~~

2. Condition D.1.5 (Particulate Matter) has been added to the revised Page 23 of the FESOP to separately address the requirements of 40 CFR 60.90, Subpart I. This new language includes the provision removed from Condition D.1.4, above, and includes the particulate matter grain loading limitation specified in the NSPS:

**D.1.5 Particulate Matter (PM)
Pursuant to the New Source Performance Standards, 326 IAC 12
(40 CFR 60.90 to 60.93, Subpart I):**

- (a) particulate matter emissions from the asphalt plant shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), and**
- (b) the visible emissions from the plant shall not exceed 20 percent opacity.**

Compliance with part (a) of this condition will satisfy the requirements of 326 IAC 6-3 (Particulate Emission Limitations).

The remaining conditions in Section D.1 shall be renumbered based on the addition of this condition.

- 3. Item 10 of the proposed Significant Modification Letter shall be revised to be consistent with the changes to Condition D.1.4, above.
- 4. Item 11 shall be added to the Significant Modification Letter to address the addition of Condition D.1.5, above. All subsequent items in the letter shall be renumbered and adjusted as appropriate to be consistent with the new condition.

In a phone call on February 24, 1999, a resident of the area where the asphalt plant is located, Mr. Kimes, requested clarification on the proposed construction permit. Mr. Kimes was concerned that a new asphalt plant was moving into a property near his home where a plant had previously been located. The OAM clarified that the proposed Significant Modification affected an existing asphalt plant down the street and did not relate to a new plant moving into the area.