INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

May 17, 2004

TO: Interested Parties / Applicant

RE: Benchmark Construction, LLC / 003-17248-00292

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Benchmark Construction, LLC
2711 Banks Avenue
Fort Wayne, Indiana 46802

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

Operation Permit No.: F003-17248-00292	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 17, 2004 Expiration Date: may 17, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary batch-mix hot asphalt manufacturing plant.

Authorized Individual:	President
Source Address:	2711 Banks Avenue, Fort Wayne, Indiana 46802
Mailing Address:	2711 Banks Avenue, Fort Wayne, Indiana 46802
General Source Phone:	(260) 459-0695
SIC Code:	2951
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) drum dryer/burner, constructed in 1972, with a maximum throughput rate of 250 tons per hour of hot asphalt mix, with a maximum heat input capacity 96.8 MMBtu/hr, using natural gas as fuel, controlled by a baghouse and exhausting through Stack #2.

(b) Aggregate conveyor, screen and materials handing operations.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) hot oil heater, constructed in 1972, with a maximum heat input capacity of 1.12 MMBtu/hr, using No. 2 fuel oil as fuel, and exhausting through Stack #1.

(b) A petroleum fuel (other than gasoline) dispensing facility with storage capacity less than 10,500 gallons and dispensing less than or equal to 230,000 gallons per month.

(c) Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(d) A quality control laboratory as defined in 326 IAC 2-7-1(21)(D).

(e) One (1) fuel oil storage tank, identified as H.U.#1, constructed in 1972, having a capacity of 1,000 gallons.

(f) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any

combination of HAPs including one (1) liquid asphalt storage tank, identified as BURNER #1, constructed in 1999, having a capacity of 25,000 gallons.

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 Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1* of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independently of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), the potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (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.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, , if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) drum dryer/burner, constructed in 1972, with a maximum throughput rate of 250 tons per hour of hot asphalt mix, with a maximum heat input capacity 96.8 MMBtu/hr, using natural gas as fuel, controlled by a baghouse and exhausting through Stack #2.

(b) Aggregate conveyor, screen and materials handing operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter 10 Microns (PM10) [326 IAC 2-8-4] [326 IAC 2-7] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, PM10 emissions from the aggregate dryer/mixer and dryer burner operations shall not exceed 19.3 pounds per hour, including both filterable and condensible fractions, when operating at a maximum process rate of 250 tons of asphalt per hour. This limit is equivalent to 84.6 tons of PM10 per year. Compliance with this limit makes 326 IAC 2-7 not applicable and makes the source minor for 326 IAC 2-2 (PSD).

D.1.2 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the dryer/mixer shall not exceed 61.0 pounds per hour when operating at a process weight rate of 250 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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:

$E = 55.0 * P^{0.11} - 40$ where: E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8-4] [326 IAC 2-7]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the emissions of PM from the aggregate dryer/mixer and dryer burner shall not exceed 44.75 pounds per hour, which is equivalent to 196 tons per year. Compliance with this limit makes the source minor for 326 IAC 2-2 (PSD).

D.1.4 Volatile Organic Compounds (VOCs) [326 IAC 8-5-2]

Pursuant to 326 IAC 8-5-2 (Asphalt Paving), no person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion of any paving application except:

(a) Penetrating prime coating;

(b) Stockpile storage; and

(c) Application during the months of November, December, January, February, and March.

D.1.5 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4] [326 IAC 2-7] [326 IAC 2-2]

Pursuant to 2-8-4 (FESOP):

In order to limit VOC emissions from the source to under 100 tons per year, the VOC emissions from any liquid binder used in asphalt production shall be limited to less than 96.66 tons per year. The liquid binder used in asphalt production shall be limited as follows:

(a) Cutback asphalt rapid cure liquid binder usage shall not exceed 101.7 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 95% volatilization)

(b) Cutback asphalt medium cure liquid binder usage shall not exceed 138 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 70% volatilization)

(c) Cutback asphalt slow cure liquid binder usage shall not exceed 386 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 25% volatilization)

(d) Emulsified asphalt with solvent liquid binder usage shall not exceed 202.0 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 49% volatilization)

(e) The VOC solvent allotments in (1) through (4) above shall be adjusted when more than one type of binder is used per twelve (12) month consecutive period with compliance determined at the end of each month. In order to determine the tons of VOC emitted per each type of binder (or for a type of binder not listed above), use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio listed in the table that follows. [The adjustment ratio is equal to 1/(percent of initial VOC in solvent that volatilizes or is emitted from the final product)]

Tons of solvent contained in binder/ Adjustment ratio = tons of VOC emitted

or

Tons of solvent contained in binder * percent volatilization = tons of VOC emitted

Type of binder	Tons VOC Solvent	Adjustment Ratio	Tons VOC Emitted
Cutback Asphalt Rapid Cure		1	
Cutback Asphalt Medium Cure		1.36	
Cutback Asphalt Slow Cure		3.8	
Emulsified Asphalt		2.04	

The equivalent total tons of VOC emitted from the combined liquid binders shall be less than 96.66 tons per twelve consecutive month period with compliance determined at the end of each month.

Therefore, the VOC emissions from the entire source are limited to less than Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 (Part 70), are not

applicable. Compliance with these limits makes the source minor for 326 IAC 2-2 (PSD).

D.1.6 Sulfur Dioxide [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations), sulfur dioxide emissions from the combustion of #2 distillate fuel oil in the hot oil heater shall be limited to 0.5 pounds per million Btu heat input. For the purpose of determining compliance, this limit shall be equivalent to a sulfur content of 0.5 weight percent in the fuel oil.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.8 Particulate Emissions

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouse controlling PM and PM10 emissions from the aggregate drum dryer/mixer and/or dryer burner shall be in operation at all times that the aggregate drum dryer/mixer and/or dryer burner are in operation.

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM and PM10 testing before September 20, 2004 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Visible Emissions Notations

(a) Visible emission notations of the aggregate drum mixer/dryer, the dryer burner stack, the transfer points, and the conveyor exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) 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.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the aggregate drum mix dryer. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.12 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate dryer burner once per shift when the aggregate dryer is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 5.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

(a) To document compliance with Condition D.1.10, the Permittee shall maintain records of visible emission notations of the aggregate drum mixer/dryer, the dryer burner stack, the transfer points, and the conveyor exhausts.

(b) To document compliance with Condition D.1.13, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11.

(d) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below.

(1) Amount and type of liquid binder used in the production of cold mix asphalt each month;

(2) Type and VOC, solvent content by weight of the liquid binder used in the production of cold mix asphalt each month;

(3) Amount of VOC, solvent used in the production of cold mix asphalt each month; and

(4) The weight of VOCs emitted for each compliance period.

Records may include: delivery tickets, manufacturer's data, material safety data sheets (MSDS), and other documents necessary to verify the type and amount used. Test results of ASTM tests for asphalt cutback and asphalt emulsion may be used to document volatilization.

(e) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO2 emission limits established in Condition D.1.6.

(1) Average sulfur content of any fuel used.

(2) Actual No. 2 fuel oil usage per month since the last compliance determination period;

(3) Average heating value of the No. 2 oil;

(4) Average sulfur dioxide (SO2) emission rate (pounds per million Btu);

(5) 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 if the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(6) Fuel supplier certifications;

(7) The name of the fuel supplier; and

(8) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(f) To document compliance with Condition D.1.7, the Permittee shall maintain records of any additional inspections prescribed in the Preventive Maintenance Plan.

(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with the VOC limit in D.1.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) One (1) liquid asphalt storage tank, identified as BURNER #1, constructed in 1999, having a capacity of 25,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.1 Reporting and Record Keeping [326 IAC 12-1] [326 IAC 2-8-4 & 326 IAC 2-8-16]

(a) Pursuant to 326 IAC 12, the Permittee shall maintain readily accessible records of the following for the asphalt storage tank:

(1) The dimension of the storage vessel; and

(2) An analysis showing the capacity of the storage vessel.

These records shall be maintained for the life of the source.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Benchmark Construction, LLC
Source Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
Mailing Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP No.: F 003-17248-00292

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:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Benchmark Construction, LLC
Source Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
Mailing Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP No.: F 003-17248-00292

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

Single Liquid Binder Solvent Quarterly Report

Source Name: Benchmark Construction, LLC
Source Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
Mailing Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP No.: F 003-17248-00292
Facility: Asphalt Plant
Parameter: VOC
Limit: Cutback asphalt rapid cure liquid binder usage shall not exceed 101.7 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis. Cutback asphalt medium cure liquid binder usage shall not exceed 138 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis. Cutback asphalt slow cure liquid binder usage shall not exceed 386 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis. Emulsified asphalt with solvent liquid binder usage shall not exceed 202 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.

YEAR: _____

The following liquid binder solvent was the only liquid binder solvent used over the previous 12 month period:_____ Limit applicable:_____
(use of more than one binder requires the use of the A Multiple Liquid Binder Solvents @ report form)

Month	Column 1 This Month (tons)	Column 2 Previous 11 Months (tons)	Column 1 + Column 2 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this reporting period.
Deviation/s occurred in this reporting period.

Deviation has been reported on: _____
Submitted by: _____
Date: _____
Title / Position: _____
Signature: _____
Phone: _____

Attach a signed certification to complete this report.

May 17, 2004

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Benchmark Construction, LLC
Source Location:	2711 Banks Ave., Fort Wayne, IN 46802
County:	Allen
SIC Code:	2951
Operation Permit No.:	F003-17248-00292
Permit Reviewer:	ERG/ST

On March 25, 2004, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Benchmark Construction, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary batch-mix hot asphalt manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation 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, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The inspector for the source requested that Condition D.1.13 be changed from "normal range of 2.0 and 8.0 inches of water" to "normal range of 5.0 and 10.0 inches of water". The following revisions have been made:

D.1.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate dryer burner once per shift when the aggregate dryer is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~2.0 and 8.0~~ **5.0 and 10.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

2. The inspector for the source requested that the permit include requirements for the Permittee to maintain records of all fuel oil used in order to demonstrate compliance with the sulfur dioxide limit in the permit.

D.1.14 Record Keeping Requirements

(a) To document compliance with Condition D.1.10, the Permittee shall maintain records of visible emission notations of the aggregate drum mixer/dryer, the dryer burner stack, the transfer points, and the conveyor exhausts.

(b) To document compliance with Condition D.1.13, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11.

(d) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below.

(1) Amount and type of liquid binder used in the production of cold mix asphalt each month;

(2) Type and VOC, solvent content by weight of the liquid binder used in the production of cold mix asphalt each month;

(3) Amount of VOC, solvent used in the production of cold mix asphalt each month; and

(4) The weight of VOCs emitted for each compliance period.

Records may include: delivery tickets, manufacturer's data, material safety data sheets (MSDS), and other documents necessary to verify the type and amount used. Test results of ASTM tests for asphalt cutback and asphalt emulsion may be used to document volatilization.

(e) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO2 emission limits established in Condition D.1.6.

(1) Average sulfur content of any fuel used.

(2) Actual No. 2 fuel oil usage per month since the last compliance determination period;

(3) Average heating value of the No. 2 oil;

(4) Average sulfur dioxide (SO2) emission rate (pounds per million Btu);

(5) 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 if the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(6) Fuel supplier certifications;

(7) The name of the fuel supplier; and

(8) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

~~(e)~~**(f)** To document compliance with Condition D.1.7, the Permittee shall maintain records of any additional inspections prescribed in the Preventive Maintenance Plan.

~~(f)~~**(g)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

issued May 17, 2004
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Benchmark Construction, LLC
Source Location:	2711 Banks Ave., Fort Wayne, IN 46802
County:	Allen
SIC Code:	2951
Operation Permit No.:	F 003-17248-00292
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Benchmark Construction, LLC, relating to the operation of a stationary batch-mix hot asphalt manufacturing plant. Benchmarch Construction, LLC was issued FESOP 003-9712-00292 on July 22, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) drum dryer / burner, constructed in 1972, with a maximum throughput rate of 250 tons per hour of hot asphalt mix, with a maximum heat input capacity 96.8 MMBtu/hr, using natural gas as fuel, controlled by a baghouse and exhausting through Stack #2.

(b) Aggregate conveyor, screen and materials handing operations.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

(a) One (1) hot oil heater, constructed in 1972, with a maximum heat input capacity of 1.12 MMBtu/hr, using No. 2 fuel oil as fuel, and exhausting through Stack #1.

(b) A petroleum fuel (other than gasoline) dispensing facility with storage capacity less than 10,500 gallons and dispensing less than or equal to 230,000 gallons per month.

(c) Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(d) A quality control laboratory as defined in 326 IAC 2-7-1(21)(D).

(e) One (1) fuel oil storage tank, identified as H.U.#1, constructed in 1972, having a capacity of 1,000 gallons.

(f) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting less than five (5)

pounds per day or one (1) ton per year of a single HAP, or emitting less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs including one (1) liquid asphalt storage tank, identified as BURNER #1, constructed in 1999, having a capacity of 25,000 gallons.

Existing Approvals

The source has been operating under FESOP 003-9712-00292, issued on July 22, 1998, with an expiration data of July 22, 2003, and with the following amendments and revisions:

(a) First Administrative Amendment, 003-11526-00292, issued June 14, 2000; and

(b) First Reopening, 003-13001-00292, issued September 20, 2001.

All conditions from previous approvals were incorporated into this FESOP.

The following terms and conditions from previous approvals have been revised in this permit:

FESOP 003-9712-00292, issued July 22, 1998 and expired on July 22, 2003:
Condition D.1.5 limiting input VOC in the production of cold mix cutback asphalt to 102.9 tons per year per twelve month consecutive period. This is equivalent to 97.8 tons of VOC emissions based on 95% volatilization and shall be changed to a limit of 101.7 tons per year per twelve month consecutive period being equivalent to 96.66 tons of VOC emissions based on 95% volatilization.

Reason for revision:
This change is necessary because the VOC emissions from the asphalt dryer burner have increased from 1.19 tons per year to 2.33 tons per year due to a change in the emission factor for natural gas burners from 2.8 lb per MMcf of gas to 5.5 lb per MMcf of gas. The source must limit total VOC emissions to under 100 tons per year in order to continue to operate under a FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on May 7, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	35,067
PM10	4,936
SO_2	2.7
VOC	greater than 100
CO	35.8
NO_x	43.1

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
TOTAL	8 4

Note: HAPs include acetaldehyde, benzene, ethylbenzene, formaldehyde, methyl chloroform, napthalene, quinone, toluene, xylene, arsenic, cadmium, chromium, lead, manganese, mercury, and nickel compounds. No single HAP exceeds unrestricted potential emissions of greater than ten (10) tons per year.

(a) The unrestricted potential emissions of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).

(c) Fugitive Emissions
Although this type of operation is not one of the twenty-eight (28) listed sources under 326 IAC 2-2, the New Source Performance Standards for Hot Mix Asphalt Facilities were in effect on August 7, 1980. Therefore, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on July 22, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F003-9712-00292, issued on July 22, 1998).

	Potential to Emit After Issuance (tons/year)						
Process / emission unit	PM	PM10	SO2	VOC	CO	NOx	HAPs*
Aggregate Dryer Burner & Mixer	46.0	29.6	0.25	2.33	35.6	42.4	8.36
Conveyor & Handling	2.15	1.02	-	-	-	-	-
Storage Piles	1.41	0.48	-	-	-	-	-
Paved & Unpaved Roads (fugitive)	49.9	13.7	-	-	-	-	-
Hot Oil Heater	0.12	0.12	2.49	neg	0.18	0.70	neg
Cutback Asphalt	-	-	-	less than 96.66	-	-	-
Total PTE After Issuance	99.5	44.9	2.74	less than 100	35.8	43.1	8.36

* HAPs include acetaldehyde, benzene, ethylbenzene, formaldehyde, methyl chloroform, napthalene, quinone, toluene, xylene, arsenic, cadmium, chromium, lead, manganese, mercury, and nickel compounds. No single HAP exceeds a potential to emit of greater than ten (10) tons per year.
"-" Emissions are negligible.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(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. Allen County has been designated as attainment or unclassifiable for ozone.

(b) Allen County has been classified as attainment or unclassifiable for PM, PM10, SO_2, NOx, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

(a) This asphalt plant is not subject to the New Source Performance Standard for Hot Mix Asphalt facilities (326 IAC 12, 40 CFR Part 60, Subpart I), because it was originally constructed in 1972 and has not been modified or reconstructed since that time.

(b) The one (1) 25,000 gallon (94.6 cubic meter) liquid asphalt storage tank is not subject to the requirements of 40 CFR 60, Subpart Kb (as revised in October 2003) because the capacity of the tank is greater than 75 cubic meters but less than 151 cubic meters and the tank contains a volatile organic liquid with a maximum true vapor pressure of less than 15.0 kilopascals (kPa). However, this tank is subject to the recordkeeping requirements in the previous version of 40 CFR 60, Subpart Kb under 326 IAC 12 (see discussion of 326 IAC 12 under State Rule Applicability).

(c) This source does not contain any facilities which are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.670, Subpart OOO - Standards of

Performance for Non-Metallic Mineral Processing Plants), because this source does not have a recycled asphalt pavement (RAP) crushing unit in which the size of the nonmetallic mineral constituents of the RAP is reduced.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 63) (326 IAC 14) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was originally constructed in 1972 and was modified in 1999. It is not in one of the 28 source categories but the New Source Performance Standard for Hot Mix Asphalt Plants was in effect on August 7, 1980. Therefore, fugitive emissions of particulate matter and VOC are counted towards applicability of PSD.

The source has a potential to emit (before controls) greater than 250 tons per year of PM, PM_{10}, and VOC. The source has accepted limits on the PM10 and VOC emissions such that the emissions of these pollutants shall not exceed 100 tons per year (see discussion of FESOP limits). In order to limit PM emissions from the entire source to less than 250 tons per year, the emissions of PM from the aggregate dryer/mixer and dryer burner shall not exceed 44.75 pounds per hour, which is equivalent to 196 tons per year. Compliance with these limitations makes the source a minor source under PSD.

Although the source was modified in 1999, this modification did not trigger PSD review because the emissions from the added facility (the liquid asphalt storage tank) are insignificant.

326 IAC 2-4.1-1 (New Source Toxics Control)

The source was constructed prior to July 27, 1997 and the HAP emissions from the entire source are less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-8-4 (FESOP)

This source has the potential to emit PM10 and VOC greater than 100 tons/yr before control. Pursuant to 326 IAC 2-8-4(FESOP), the source has accepted the following requirements:

(a) In order to limit PM10 emissions from the entire source to less than one hundred (100) tons per year, the PM10 emissions from the aggregate dryer will be limited to less than 84.6 tons per year. Emission of PM10 from the aggregate dryer shall not exceed 19.3 pounds of PM10 per hour when operating at a maximum process rate of 250 tons per hour of asphalt. The source uses a bag type dust collection system to control particulate matter emissions from the aggregate dryer. The baghouse shall be in operation at all times the aggregate drum mix dryer is in operation, in order to comply with this limit. Combined with the PM10 emissions from all other facilities at the source, the PM10 emissions from the entire source are limited to less than one-hundred (100) tons per year.

The stack test result on September 20, 1999 showed that PM10 emissions from this dryer were 5.99 pounds per hour at a flow rate of 49,053 acfm. The source is currently in compliance with the limit.

(b) In order to limit VOC emissions from the source to under 100 tons per year, the VOC emissions from any liquid binder used in asphalt production shall be limited to less than 96.7 tons per year. The liquid binder used in asphalt production shall be limited as follows:

(1) Cutback asphalt rapid cure liquid binder usage shall not exceed 101.7 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 95% volatilization)

(2) Cutback asphalt medium cure liquid binder usage shall not exceed 138 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 70% volatilization)

(3) Cutback asphalt slow cure liquid binder usage shall not exceed 386 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 25% volatilization)

(4) Emulsified asphalt with solvent liquid binder usage shall not exceed 202.0 tons of VOC solvent per twelve (12) consecutive month period with compliance determined at the end of each month. (Based on 49% volatilization)

(5) The VOC solvent allotments in (1) through (4) above shall be adjusted when more than one type of binder is used per twelve (12) month consecutive period with compliance determined at the end of each month. In order to determine the tons of VOC emitted per each type of binder (or for a type of binder not listed above), use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio listed in the table that follows. [The adjustment ratio is equal to 1/(percent of initial VOC in solvent that volatilizes or is emitted from the final product)]

Tons of solvent contained in binder/ Adjustment ratio = tons of VOC emitted

or

Tons of solvent contained in binder * percent volatilization = tons of VOC emitted

Type of binder	Tons VOC Solvent	Adjustment Ratio	Tons VOC Emitted
Cutback Asphalt Rapid Cure		1	
Cutback Asphalt Medium Cure		1.36	
Cutback Asphalt Slow Cure		3.8	
Emulsified Asphalt		2.04	

The equivalent total tons of VOC emitted from the combined liquid binders shall be less than 96.66 tons per twelve consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) are not applicable.

326 IAC 5-1 (Opacity Limitations)

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 the permit:

(a) Opacity of visible emissions shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity of visible emissions shall not exceed sixty percent (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.

326 IAC 6-1 (PM Emission Limits for the General Source)

This source is a stationary source and is located in Allen County. Therefore, the requirements of this rule do not apply.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This source consists of unpaved roads and stockpiles of aggregate, which have the potential to generate fugitive dust that may escape beyond the property line or boundaries of the property. Hence, this source is subject to the provisions of 326 IAC 6-4. Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This stationary source is located in Allen County, has received all the necessary preconstruction approvals before December 13, 1985 and has not constructed any new sources of fugitive particulate emissions since that time. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 8-5-2 (Asphalt Paving)

The requirements of 326 IAC 8-5-2 are applicable to any asphalt paving operation located anywhere in the state. Pursuant to 326 IAC 8-5-2 (Asphalt Paving), no person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion of any paving application except:

(a) penetrating prime coating

(b) stockpile storage

(c) application during the months of November, December, January, February, and March.

State Rule Applicability - Dryer

326 IAC 6-3-2 (Particulate Emissions from Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, particulate emissions from the 250 ton per hour dryer shall not exceed 61.0 pounds per hour when operating at a process weight rate of 250 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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:

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

The baghouse shall be in operation at all times the dryer/burner is in operation, in order to comply with this limit.

A stack test result on September 20, 1999 showed that actual PM emissions from this dryer are 5.53 pounds per hour based on a flow rate of 49,053 acfm. Therefore, the dryer is currently in compliance with 326 IAC 6-3-2.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The dryer does not have the potential to emit 25 tons per year or more of SO_2, therefore the requirements of 326 IAC 7-1.1-2 do not apply.

State Rule Applicability - Oil Heater

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The hot oil heater has the potential to emit greater than 25 tons per year or more of SO_2. Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from the hot oil heater shall be limited to less than five-tenths (0.5) pound per million Btu for distillate oil consumption. For the purpose of determining compliance, this limit shall be equivalent to a sulfur content of 0.5 weight percent in the fuel oil.

State Rule Applicability - Insignificant Activities

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The requirements of 326 IAC 8-9 do not apply to the liquid asphalt storage tank because the source is not located in Clark, Floyd, Lake or Porter counties.

326 IAC 12 (New Source Performance Standards)

The one (1) 25,000 gallon liquid asphalt storage tank (BURNER # 1) is subject to the requirements of 326 IAC 12 because it has a volume greater than 75 cubic meters but less than 151 cubic meters and contains a volatile organic liquid with a maximum true vapor pressure less than 15.0 kilopascals. Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions of the tank and an analysis showing the capacity of the storage tank. These records shall be maintained for the life of the source.

326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Kb, that predates the revisions made to 40 CFR 60, Subpart Kb on October 15, 2003. Subsequent to the revisions made to 40 CFR 60, Subpart Kb on October 15, 2003, the asphalt storage tank is not subject to the requirements of 40 CFR 60, Subpart Kb, because the tank has a capacity greater than 75 cubic meters but less than 151 cubic meters and the tank contains a liquid with a maximum true vapor pressure less than 15.0 kilopascals (kPa). This requirement will remain in effect until the State of Indiana incorporates the revised version of 40 CFR, Subpart Kb into its SIP.

Testing Requirements

The Permittee shall perform PM and PM10 testing on the exhaust from the baghouse controlling emissions from the aggregate drum mixer and dryer burner no later than September 20, 2004. A test shall be repeated at least once every five (5) years. The five (5) year period shall be from the date of the last valid compliance demonstration test.

This testing is required under 326 IAC 2-8-5(a)(1) in order to certify compliance with 326 IAC 2-8 (FESOP), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations). The Permittee shall use test methods approved by the Commissioner. The PM10 emissions includes filterable and condensible PM10.

A stack test conducted on September 20, 1999 showed that the source is in compliance with the PM and PM10 emission limits established in FESOP 003-9712-00292, issued on July 22, 1998.

No stack testing is required to determine compliance with the VOC emission limit because the source will maintain record of the amount and type of binder used.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a

result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

The dryer/burner stack exhaust**,** conveyers and material transfer points have applicable compliance monitoring conditions as specified below:

(a) Once per shift visible emissions notations of the dryer/burner stack exhaust, conveyers and material transfer points 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, eighty percent (80%) of the time the process is in operation, not counting startup or shut down 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 (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouse controlling the dryer/burner at least once per shift when the aggregate mixer/dryer is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) An inspection shall be performed within the last month of each calender quarter of all bags controlling the dryer/burner. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Compliance Response Plan shall be considered a deviation from the permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the

Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of the permit.

These monitoring conditions are necessary because the baghouse for the aggregate dryer and the materials conveyors must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this batch hot mix asphalt manufacturing plant shall be subject to the conditions of the attached FESOP No.: F003-17248-00292.

Appendix A: Emission Calculations
96.8 MMBtu/hour Asphalt Heater (Dryer Burner)
Natural Gas Combustion

Company Name: Benchmark Construction, LLC
Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP: F 003-17248-00292
Plt ID: 003-00292
Reviewer: ERG/ST
Date: October 14, 2003

Heat Input Capacity MMBtu/hr
96.8

Potential Throughput MMCF/yr
848.0

	Pollutant				
	SO_2	NOx **	VOC	CO	HAPs
Emission Factor in lb/MMCF	0.6	100.0	5.5	84.0	0.09
Potential Emission in tons/yr	0.254	42.4	2.3	35.6	0.04

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas
1000 Btu per cubic foot of natural gas

Note: The emissions of PM and PM10 from the dryer are estimated using the AP-42, Chapter 11.1 emission factors for Asphalt Plants and are shown on page three of Appendix A. The emissions of SO_2, NOx, VOC and CO are estimated using the boiler emission factors from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98) The boiler emission factors are being used for these pollutants based on IDEM, OAQ guidance.

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
PTE (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1/2,000 (ton/lb)

Total HAP emissions from the dryer burner operations are negligible.

Appendix A: Emission Calculations
1.12 MM Btu Oil Heater
#2 Distillate Fuel Oil Combustion

Company Name: Benchmark Construction, LLC
Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP: F 003-17248-00292
Plt ID: 003-00292
Reviewer: ERG/ST
Date: October 14, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
1.12	70.1	0.5

	Pollutant						
	PM*	PM10*	SO_2	NO_x	VOC	CO	HAPs
Emission Factor in lb/kgal	3.3	3.3	71 *(142.0 S)*	20.0	0.34	5.0	0.040
Potential Emission in tons/yr	0.1	0.1	2.49	0.7	0.0	0.2	0.00

*PM emission factor is for filterable PM (AP-42, Table 1.3-1) and condensible PM (AP-42, Table 1.3-2), added together.
1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Emission Factors are from AP-42, Chapter 1.3 - Distillate Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3, (SCC 1-03-005-01/02/03), (Supplement E 9/98) (see errata file)
Emission factors for HAPs are from AP-42, Tables 1.3-9 and 1.3-10.

Methodology
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu
PTE (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Total HAP emissions from the oil heater operations are negligible.

Appendix A: Emission Calculations
Aggregate Drying: Batch Mix Plant
PM, PM10 and HAP Emissions Before and After Controls

Company Name: Benchmark Construction, LLC
Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP: F 003-17248-00292
Plt ID: 003-00292
Reviewer: ERG/ST
Date: October 14, 2003

PTE Before Controls

Pollutant	EF (lb/ton)	Capacity (ton/hr)	Potential Total Emissions (tons/year) *
PM	32	250	35040.0
PM-10	4.5	250	4927.5
HAPs	0.0076	250	8.32

* These emissions are base on operating the plant at full capacity for 8760 hours /year.

PTE After Controls

Pollutant	EF (lb/ton)	Capacity (ton/hr)	Potential Total Emissions (tons/year)
PM	0.042	250	46.0
PM-10	0.027	250	29.6
HAPs	0.0076	250	8.32

PM includes both filterable and condensible PM.
Emission factors for PM and PM10 are from AP-42, Chapter 11.1 - Hot Mix Asphalt Plants, Table 11.1-1 (12/2000).
Emission Factor for HAPs is from AP-42, Chapter 11.1 - Hot Mix Asphalt Plants, Table 11.1-9 (12/2000).
Based on 8760 hours of use per year

Methodology
PTE (tons/yr) = Capacity (tons/hr) x Emission Factor (lb/ton) x 8760 (hrs/yr) x 1/2000 (tons/lb)

Appendix A: Emission Calculations
Materials Conveying and Handling

Company Name: **Benchmark Construction, LLC**
Address: **2711 Banks Avenue, Fort Wayne, Indiana 46802**
FESOP: **F 003-17248-00292**
Plt ID: **003-00292**
Reviewer: **ERG/ST**
Date: **October 14, 2003**

Storage Pile Handling and Materials Conveying (see AP-42 for more information)

Operation Type	Number	Emission Factor (lb PM10/ton)	PM Emissions	PM-10 Emissions
			tons/yr	tons/yr
Front-End Loader *	1	0.0001	0.2	0.1
Conveyor *	1	0.000048	0.1	0.0
Screening *	1	0.00084	1.8	0.9
Totals			**2.15**	**1.02**

Capacity = 236.25 tons/hour of crushed stone

These calculations determine the amount of emissions created by wet (>1.5%) material handling, based on 8760 hours of operation per year.
Emission Factors are from AP-42, Chapter 11.19.2 - Crushed Stone Processing, Table 11.19.2-2. (1/95)
* Controlled by Moisture (SCC 3-05-020-32, 3-05-020-06, 3-05-020-02-03)
The emission factor multiplier used for calculating PM emissions (2.1 x the PM10 emission factor) is from AP-42, Chapter 11.19.2, Table 11.19-2-2, Footnote c. (1/95)

Methodology
PTE for PM10 (tons/yr) = Capacity (tons/hr) x 8760 (hrs/yr) x Emission factor (lb/ton) x Number of Operations.
PTE for PM (tons/yr) = PM10 emissions x 2.1

Appendix A: Emission Calculations
Fugitive PM Emissions from Storage Piles

Company Name: **Benchmark Construction, LLC**
Address: **2711 Banks Avenue, Fort Wayne, Indiana 46802**
FESOP: **F 003-17248-00292**
Plt ID: **003-00292**
Reviewer: **ERG/ST**
Date: **October 14, 2003**

Storage Piles (see AP-42 for more information)

Material	Silt Content:	Pile Size (acres)	Storage Capacity (tons)	Emission Factor (lb/acre/day)	PM (tons/yr)	PM10 (tons/yr)
Sand	1.1	0.918	61000	1.27	0.26	0.09
Stone	1.2	9.04	246000	1.39	1.15	0.39
Slag	1	0	0	1.16	0.00	0.00
Gravel	1	0	0	1.16	0.00	0.00
RAP	0.8	0	0	0.93	0.00	0.00
Totals			307000		**1.41**	**0.48**

Emission Factor = Ef = 1.7 (s/1.5) * (365-p) / 235 * (f/15)
Ef = 1.39 lb/ac/day

where: s = 1.2 % silt content of material
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Density of stone and sand = 1 ton / 20 cubic feet
Storage capacity (SC) of site (tons) = 307000

Methodology
PTE for PM (ton/yr) = Emission Factor (lb/acre/day) x Storage Capacity (tons) x (20 cuft/ton) x 365 (day/yr) x 1/2000 (ton/lb) x 43560 (sqft/acre) x height of piles (25 ft)

Appendix A: Emission Calculations
Fugitive Emissions
From Unpaved Roads

Company Name: **Benchmark Construction, LLC**
Address: **2711 Banks Avenue, Fort Wayne, Indiana 46802**
FESOP: **F 003-17248-00292**
Plt ID: **003-00292**
Reviewer: **ERG/ST**
Date: **October 14, 2003**

1. Emission Factors:

According to AP-42, Chapter 13.2.2 - Unpaved Roads (12/03), the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$E = x\,(w/3)^{b} \times ((365 - p)/365)$$

where:

E =	emission factor (lb/vehicle mile traveled)		
s =	surface material silt content (%) =	7.1	% (AP-42, Table 13.2.2-1)
w =	mean vehicle weight (tons) =	34.0	tons *
k =	empirical constant =	4.9 for PM and 1.5 for PM10	
a =	empirical constant =	0.7 for PM and 0.9 for PM10	
b =	empirical constant =	0.45 for PM and PM10	
p =	number of days per year with 0.01 inches precipitation	120	

PM Emission Factor = $4.9 \times (6.4/12)^{0.7} \times (14.09/3)^{0.45} \times ((365 - p)/365)$ = **6.79** lbs/mile

PM10 Emission Factor = $1.5 \times (6.4/12)^{0.9} \times (14.09/3)^{0.45} \times ((365 - p)/365)$ = **1.87** lbs/mile

Length of Unpaved Roads in One Direction = **0.028** miles

2. Potential to Emit (PTE) of PM/PM10 Before Control from Unpaved Roads:

Vehicle Type		Trucks per day	Miles per Trip	*Total Trip Number (trips/yr)	*Traffic Component (%)	Vehicle Weight (tons)	Vehicle Mile Traveled (VMT) (miles/yr)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)
Frond End Loader		708	0.057	258,420	100.00%	34.0	14,683	49.9	13.74
Total		**708**			**100%**			**49.9**	**13.74**

Methodology

Average Vehicle Weight (ton) = (Weight of Unloaded Vehicles + Weight of Loaded Vehicles) / 2
Component Vehicle Weight = Avg. Vehicle Weight (tons) x Traffic Component (%)
(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)
VMT(miles/yr) = 0.057 mile/trip x 2 x Total Trip Numbers (trips/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factors (lbs/mile) x 1 tons/ 2000 lbs
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factors (lbs/mile) x 1 tons/ 2000 lbs

Appendix A: Emission Calculations
Cutback Asphalt

Company Name: Benchmark Construction, LLC
Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP: F 003-17248-00292
Plt ID: 003-00292
Reviewer: ERG/ST
Date: October 14, 2003

Based on rapid cure cutback as worst case

101.74 Tons of diluent
95% Percent VOC emitted
96.66 VOC emissions allowed = (99 - total other VOC emissions)

Tons VOC limited per year $\frac{96.66}{95\%}$ = **101.7433** Tons of Rapid Cure Cutback per year
Percent emitted

VOC emissions from the source must be less than **96.66** tons per year in order to comply with the FESOP limitations.

	% of solvent evaporated	Amount diluent allowed
Rapid Cure	95%	101.7
Medium Cure	70%	138.1
Slow Cure	25%	386.6

Emission factors for rapid, medium and slow cure cutback asphalt from AP-42, 4.5.2 (7/79)

Appendix A: Emission Calculations
Emissions Summary

Company Name: Benchmark Construction, LLC
Address: 2711 Banks Avenue, Fort Wayne, Indiana 46802
FESOP: F 003-17248-00292
Plt ID: 003-00292
Reviewer: ERG/ST
Date: October 14, 2003

Facility	Pollutant Emissions Prior to Controls (tons/year)						
	PM	PM10	SO_2	NOx	VOC	CO	HAP
Asphalt Dryer Burner (nat. gas)	35040	4928	0.25	42.4	2.33	35.6	8.36
Oil Heater (No.2 fuel Oil)	0.12	0.12	2.49	0.70	0.01	0.18	0.00
Handling & Conveying	2.15	1.02	0	0	0	0	0
Storage Piles	1.41	0.48	0	0	0	0	0
Unpaved Roads	49.9	13.7	0	0	0	0	0
Cutback Asphalt	0	0	0	0	> 100	0	0
Totals	**35094**	**4943**	**2.74**	**43.1**	**> 100**	**35.8**	**8.36**

Prior to controls and limits, the source's potential emissions exceed the Part 70 thresholds of 100 tons per year for PM-10 and VOC and the PSD threshold of 250 tons per year for PM.

Facility	Pollutant Emissions After FESOP Limits and Controls (tons/year)						
	PM	PM10	SO_2	NOx	VOC	CO	HAP
Asphalt Dryer Burner (nat. gas)	46.0	29.6	0.25	42.4	2.33	35.6	8.36
Oil Heater (No.2 fuel Oil)	0.12	0.12	2.49	0.70	0.01	0.18	0.00
Handling & Conveying	2.15	1.02	0	0	0	0	0
Storage Piles	1.41	0.48	0	0	0	0	0
Unpaved Roads	49.9	13.7	0	0	0	0	0
Cutback Asphalt	0	0	0	0	96.66	0	0
Totals	**99.5**	**44.9**	**2.74**	**43.1**	**99.0**	**35.8**	**8.36**

Notes:
The Asphalt Dryer Burner uses natural gas as a fuel.
The Asphalt Dryer Burner and the Aggregate Batch Mixer control PM and PM-10 with a baghouse