



Joseph E. Kernan
Governor

November 20, 2003

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

Lori F. Kaplan
Commissioner

TO: Interested Parties / Applicant
RE: Dave O'Mara Contractor / 119-18153-05227
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.

November 20, 2003

Ms. Amy Boswell
Dave O'Mara Contractor, Inc.
1100 East O & M Avenue
North Vernon, IN 47265

Re: 119-18153-05277
First Minor Permit Revision to
FESOP 119-16844-05277

Dear Ms. Boswell:

Dave O'Mara Contractor, Inc. was issued a FESOP on June 19, 2003, for a portable hot drum mix asphalt plant. A letter requesting changes to this permit was received on September 10, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of No. 4 used oil as an alternative fuel for the aggregate dryer burner.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima D. Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Owen County
U.S. EPA, Region V
Owen County Health Department
Air Compliance Section Inspector – Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

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

**Dave O'Mara Contractor, Inc.
Portable**

(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.

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.: F119-16844-05227	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 19, 2003 Expiration Date: June 19, 2008

First Minor Permit Revision No.: 119-18153-05227	Pages Modified: 3, 4, 5, 26, 26a, 27, 28, 29, 37a
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date November 20, 2003

Compliance Requirements [326 IAC 2-1.1-11]

- C.12 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.14 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Portable Source Requirement

- C.22 Relocation of Portable Sources [326 IAC 2-14-4]

Stratospheric Ozone Protection

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Aggregate Mixing and Drying 25

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

- D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]
- D.1.2 Particulate Matter (PM) [326 IAC 12][40 CFR 60.90, Subpart I][326 IAC 2-2] [326 IAC 6-1-2]
- D.1.3 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]
- D.1.4 Particulate Matter 10 Microns (PM10) [326 IAC 2-8-4][326 IAC 2-2]
- D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1][326 IAC 7-2-1]
- D.1.6 Fuel Usage Limitations [326 IAC 2-8-4][326 IAC 2-2]
- D.1.7 Fuel Usage Limitation [326 IAC 2-8-11.1]
- D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.9 Particulate Matter (PM)
- D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.11 Sulfur Dioxide Emissions and Sulfur Content

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

- D.1.12 Visible Emissions Notations
- D.1.13 Parametric Monitoring
- D.1.14 Baghouse Inspections
- D.1.15 Broken or Failed Bag Detection

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

D.1.16 Record Keeping Requirements

D.1.17 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Cold-mix (stockpile mix)

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-2] [326 IAC 2-8-4][326 IAC 2-2]

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

D.2.2 Record Keeping Requirements

D.2.3 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS

Liquid Asphalt Storage Tank, No. 2 Distillate Fuel Oil Storage Tank

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 12] [40 CFR 60.110b, Subpart Kb]

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

D.3.2 Record Keeping Requirements [326 IAC 12][40 CFR 60.110b, Subpart Kb]

Certification Form

Emergency Occurrence Form

Quarterly Report Forms

Quarterly Deviation and Compliance Monitoring Report Form

Attachment A - ASPHALT PLANT SITE FUGITIVE DUST CONTROL PLAN

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 portable hot drum mix asphalt plant.

Authorized individual:	Amy Boswell, Controller
Source Address:	Hansen Aggregates, Fifth Street, North Vernon, Indiana 47265
Mailing Address:	1100 East O & M Avenue, North Vernon, Indiana 47265
General Source Phone:	(812)346-4135
SIC Code:	2951
Source Location Status:	Owen
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) portable asphalt drum-mix plant, with a maximum capacity of 300 tons per hour, equipped with one (1) #2 fuel oil fired aggregate dryer burner with a maximum rated capacity of 72 million British thermal units (MMBtu) per hour, using natural gas as a back up fuel and No.4 used oil for energy recovery as an alternative fuel, and one (1) baghouse for particulate control, exhausting at one (1) stack, identified as #1;
- (b) five (5) compartment cold feed bins with feeders and collection conveyors;
- (c) one (1) 30" incline conveyor with 4' X 10' scalping screen;
- (d) two (2) conveyors and one (1) screen to transfer aggregate from recycle bin to asphalt dryer;
- (e) one (1) conveyor and one (1) hot elevator to transfer product from asphalt dryer to storage silo;
- (f) cold-mix (stockpile mix) asphalt storage piles;
- (g) one (1) 20,000 gallon asphalt storage tank; and
- (h) one (1) 15,000 gallon #2 fuel oil storage tank.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) portable asphalt drum-mix plant, with a maximum capacity of 300 tons per hour, equipped with one (1) #2 fuel oil fired aggregate dryer burner with a maximum rated capacity of 72 million British thermal units (MMBtu) per hour, using natural gas as a back up fuel and No. 4 used oil for energy recovery as an alternative fuel, and one (1) baghouse for particulate control, exhausting at one (1) stack, identified as #1;
- (b) five (5) compartment cold feed bins with feeders and collection conveyors;
- (c) one (1) 30" incline conveyor with 4' X 10' scalping screen;
- (d) two (2) conveyors and one (1) screen to transfer aggregate from recycle bin to asphalt dryer;
- (e) one (1) conveyor and one (1) hot elevator to transfer product from asphalt dryer to storage silo;

(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 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart I.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 12] [40 CFR 60.90, Subpart I][326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-1-2 (Particulate Emissions Limitations), the particulate matter emissions from the mixing and drying operation shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf) of exhaust air. This is equivalent to a particulate matter emission rate of 13.35 pounds per hour. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (b) Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf) of exhaust air. This is equivalent to a particulate matter emission rate of 17.80 pounds per hour.

Compliance with the PM emission limit pursuant to 326 IAC 6-1-2 will also satisfy the PM emission limit pursuant to 326 IAC 12, 40 CFR Part 60.90, Subpart I.

D.1.3 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

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

D.1.4 Particulate Matter 10 Microns (PM10) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, PM10 emissions from the aggregate mixing and drying operation shall not exceed 0.064 pound of PM10 per ton of asphalt mix which is equivalent to 19.32 pounds per hour, based on a maximum throughput of 300 tons of asphalt mix per hour, including both filterable and condensable fractions. Based on 8,760 hours of operation per 12 consecutive month period, this limits PM-10 emissions from the aggregate mixing and drying operation to 84.61 tons per year for a source-wide total potential to emit of less than 100 tons per year.

Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1][326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 72.0 million Btu per hour burner for the aggregate dryer shall be limited to 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using No. 2 distillate oil.
- (b) Pursuant to 326 IAC 7-1.1-2 (SO₂ Emissions Limitations) the SO₂ from the aggregate dryer burner shall not exceed one and six-tenths (1.6) pounds per mMBtu heat input when combusting #4 used oil.
- (c) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.6 Fuel Usage Limitations [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4(1), the maximum sulfur content of the No. 2 distillate fuel oil used in the 72.0 MMBtu per hour burner for the aggregate dryer shall be limited to 0.05%, so that SO₂ emissions are limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 will not apply. This limitation will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

D.1.7 Fuel Usage Limitations [326 IAC 2-8-11.1]

- (a) The input of #4 used oil to the aggregate dryer burner shall be limited to 825.4 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month, such that the emissions of SO₂ and NO_x are limited to less than twenty five (25) tons per year, each.
- (b) For purposes of determining compliance based on SO₂ emissions, each 30.18 gallons of #4 used oil shall be equivalent to 1000 gallons of #2 fuel oil.

D.1.8 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.1.9 Particulate Matter (PM)

In order to comply with D.1.2(a) and (b), and D.1.4 the baghouse for PM and PM10 control shall be in operation and control emissions from the drum mix dryer/burner at all times that the drum mix dryer/burner is in operation.

D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

No later than 90 days after initial start up, in order to demonstrate compliance with Conditions D.1.2(a) and (b), and D.1.4, the Permittee shall perform PM, and PM10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5 for PM and methods as approved by the Commissioner for PM-10. PM-10 includes filterable and condensable PM-10. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.11 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input when burning No. 2 distillate fuel oil by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 72 MMBtu per hour burner for the aggregate dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.12 Visible Emissions Notations

- (a) Visible emission notations of the drum mix dryer/burner baghouse stack exhaust, conveyors, and transfer points, 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 violation of this permit.

D.1.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate dryer, mixer, and burner, at least once per shift when the aggregate dryer, mixer, and burner are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 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 violation of 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.

D.1.14 Baghouse Inspections

- (a) An inspection shall be performed each calendar quarter of all bags controlling the aggregate dryer, mixer, and burner with no two (2) inspections conducted in consecutive months. All defective bags shall be replaced.
- (b) Inspections required by this condition shall not prevent the Permittee from conducting additional voluntary inspections provided that the requirements of this condition are met.

D.1.15 Broken or Failed Bag 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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 violation of this permit.
- (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).

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

D.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5, D.1.6 and D.1.7, the Permittee shall maintain records in accordance with (1) through (3) below. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) A certification, signed by the owner or operator, that the records of the fuel oil 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:

- (2) The name of the fuel supplier; and
- (3) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) The Permittee shall maintain records sufficient to verify compliance with the procedures specified in condition D.1.11. Records shall be maintained for a period of five (5) years and shall be made available upon request by IDEM.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain records of the once per shift visible emission notations of the drum mix dryer/burner baghouse stack exhaust, conveyors, and transfer points.

- (d) To document compliance with Condition D.1.13, the Permittee shall maintain once per shift records of the total static pressure drop during normal operation.
- (e) To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the inspections required under Condition D.1.14.
- (f) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.6 and D.1.7 shall be submitted to the address 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE BRANCH**

No. 4 Used Oil Quarterly Report

Source Name: Dave O'Mara Contractor, Inc.
 Initial Source Address: Hansen Aggregates, Fifth Street, North Vernon, Indiana 47265
 Mailing Address: 1100 East O & M Avenue, North Vernon, Indiana 47265
 FESOP No.: F119-16844-05227
 Facility: Aggregate Dryer Burner
 Parameter: #4 Used Oil Usage
 Limit: Less than 825400 gallons per twelve (12) consecutive month period with compliance determined at the end of each month equivalent to less than twenty-five (25) tons per year of SO₂ and NO_x per year each. For purposes of determining compliance based on SO₂ emissions, each 1000 gallons of #2 fuel oil shall be equivalent to 30.18 gallons of #4 used oil.

YEAR: _____

Month	#4 Used Oil Usage (gallons)	#4 Used Oil Usage (gallons)	#4 Used Oil Usage (gallons)
	This Month	Previous 12 Months	12 Month Total
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.

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

Technical Support Document (TSD) for a Minor Permit Revision to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Dave O'Mara Contractor, Inc.
Source Location:	Hansen Aggregates, Fifth Street, North Vernon, Indiana 47265
County:	Owen
SIC Code:	2951
Operation Permit No.:	F119-16844-05227
Operation Permit Issuance Date:	June 19, 2003
Minor Permit Revision No.:	119-18153
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a revision application from Dave O'Mara Contractor, Inc. relating to the operation of a portable hot drum mix asphalt plant.

History

Dave O'Mara Contractors, Inc. was issued a FESOP on June 19, 2003. On September 10, 2003, an application was submitted to OAQ requesting to add the use of No. 4 reprocessed used oil as an alternative fuel to the existing natural gas-fired aggregate dryer. Pursuant to 40 CFR 279, Subpart G, Dave O'Mara Contractors, Inc. is permitted to add the use of No. 4 used oil for energy recovery as an alternate fuel to the aggregate dryer because pursuant to 40 CFR 260.10, the aggregate dryer is considered an industrial furnace as an aggregate kiln.

Existing Approvals

The source was issued a FESOP No. 119-16844-05227 on June 19, 2003.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision 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.

A complete application for the purposes of this review was received on September 10, 2003.

Emission Calculations

Heat input capacity of aggregate dryer = 72 mmBtu/hr

Heat Capacity = 0.138 mmBtu/gal

Potential throughput = $72 \text{ mmBtu/hr} \times 8760 \text{ hr/yr} / (0.138 \text{ mmBtu/gal} \times 1000 \text{ kgal/gal}) = 4570.4 \text{ Kgal/yr}$

Limited Potential to Emit for Used Oil No. 4:

Density = 7.387 lb/gal

Sulfur Content = 0.41%

To qualify for a minor permit revision under 326 IAC 8-11.1(d)(5)(D) as requested by source, the fuel usage limitation is estimated as follows:

Potential emissions of SO₂ and NO_x < 25 tons per year each

Emissions of SO₂ = 2 lb/ lb of sulfur in used oil

Therefore, fuel usage has to be limited to

$$\frac{25 \text{ tons/yr} \times 2000 \text{ lb/ 1 ton}}{0.0041 \times 7.387 \text{ lb/ gal} \times 2 \text{ lb SO}_2/\text{lb sulfur}} = 825444.8 \text{ gallons per year} = 825.4 \text{ Kgal/yr}$$

$$0.0041 \times 7.387 \text{ lb/ gal} \times 2 \text{ lb SO}_2/\text{lb sulfur}$$

This fuel usage limit will also limit the potential to emit of NO_x to less than 25 tons per year.

	PM	PM-10	SO ₂	NO _x	VOC	CO
Emission Factor (lb/Kgal)	2.8	2.8	60.6	11.0	1.0	1.7
Unrestricted Potential to Emit (tons/yr)¹	2.05	2.05	138.5	25.15	2.27	3.88
Limited Potential to Emit (tons/yr)²	0.27	0.27	25.0	4.54	0.41	0.70

¹ Based on maximum rated capacity of aggregate dryer (72 mmBtu/hr) or used oil usage of 4570.4 Kgal/yr, emission factor estimated at 1% ash content.

² Based on limited fuel usage of 825.4 Kgal/yr for no. 4 used oil, emission factor estimated at 1% ash content.

Potential to Emit of the Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Unrestricted Potential to Emit (tons/yr)	Limited Potential to Emit (tons/yr)
PM	2.05	0.27
PM-10	2.05	0.27
SO ₂	138.5	25.0
VOC	2.27	0.41
CO	3.88	0.70
NO _x	25.15	4.54

- (a) This revision to the existing FESOP No. 119-16844-05277 will not change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.

Justification for the Revision

The FESOP is being modified through a Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(5)(D), which states in part that a Minor Permit Revision can be used for “modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants”, by “limiting individual fuel usage and fuel type for a combustion source”. The source has requested the potential to emit of SO₂ and NO_x from this revision to be limited to less than twenty-five (25) tons per year each.

County Attainment Status

The source is located in Owen County.

Pollutant	Status
PM-10	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. Owen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Owen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Portable Source

- (a) Initial Location
This is a portable source and its initial location is Hansen Aggregates, Fifth Street, North Vernon, Indiana 47265.
- (b) PSD and Emission Offset Requirements
The emissions from this portable source were reviewed under the requirements of the Prevention of Significant Deterioration (PSD), 326 IAC 2-2, and Emission Offset, 326 IAC 2-3.
- (c) Fugitive Emissions
Since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

Federal Rule Applicability

- (a) There are no additional New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source as a result of this proposed revision. The NSPS applicability of the source remains unchanged from that determined in Technical Support Document for FESOP No. 119-16844-05227.

- (b) There are no additional National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source as result of this proposed revision. The NESHAP applicability remains unchanged from that determined in Technical Support Document for FESOP No. 119-16844-05227.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This drum mix hot asphalt manufacturing portable source is prohibited from locating in severe non-attainment counties (Lake and Porter Counties). It is not one of the twenty-eight (28) listed source categories. The potential to emit of all pollutants from the entire source, including this proposed revision, are less than 250 tons per year. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-8 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). The fuel usage limit on used oil No.4 is based on the 25 tons per year SO₂ and NO_x limit for minor permit revision, and will be incorporated into the FESOP No. 119-16844-05227. This limit will also ensure that the entire source SO₂ emissions do not exceed 100 tons per year when burning No. 4 used oil. According to the technical support document for FESOP No. 119- 16844-05227, the source chose to limit the sulfur content of fuel oil No. 2 to 0.05% in order to limit SO₂ emissions to less than 100 tons per year. A fuel usage limit was not necessary when burning No. 2 fuel oil in order to comply with 326 IAC 2-8.

For purposes of determining compliance based on SO₂ emissions, each 30.18 gallons of #4 fuel oil (with 1.6% sulfur by weight limit based on 326 IAC 7-1.1) shall be equivalent to 1000 gallons of #2 fuel oil (with limited sulfur content of 0.05% by weight).

The equivalency has been calculated as follows:

(147S) lb of SO₂/ Kgal of #4 used oil is equivalent to (142S) lb of SO₂/kgal of #2 fuel oil

(147x 1.6) lb of SO₂/Kgal of #4 used oil is equivalent to (142 x 0.05) lb of SO₂/kgal of #2 fuel oil

235.2 lb of SO₂/Kgal of #4 used oil is equivalent to 7.1 lb of SO₂/Kgal of # 2 fuel oil

Therefore, each **1000** gallons of #2 fuel oil is equivalent to (1000 x 7.1/235.2) = **30.18** gallons of #4 used oil.

The PM-10 emission factor No.4 used oil was estimated to be 0.7 lb/1000 gal based on 1% ash content, which is lower than the emission factor for no. 2 fuel oil of 3.3 lb/1000 gal. Therefore, the PM-10 emission limits in the permit will remain unchanged as a result of this revision.

326 IAC 2-8-11.1 (FESOP Permit Revisions)

The input of #4 used oil to the aggregate dryer burner shall be limited to less than 825.4 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month, such that the emissions of SO₂ and NO_x are limited to less than twenty five (25) tons per year, each.

State Rule Applicability – Individual Facilities

326 IAC 7-1.1-2 (Sulfur Dioxide Rule)

Since the unrestricted potential to emit of SO₂ from the dryer burner is greater than twenty-five (25) tons per year, this source is subject to 326 IAC 7-1.1-1:

When operating on No. 4 used oil, the SO₂ emissions shall be limited to one and six-tenths (1.6) pounds per million Btu.

For the 72.0 mmBtu/hr dryer burner:

Emissions Rate (lb/mmBtu) = Potential throughput (Kgal/yr) x 1 yr/8760 hr) x EF (lb/Kgal) / Heat Capacity (mmBtu/hr)

$$= 4570.4 \text{ Kgal/yr} \times (1 \text{ hr}/8760 \text{ hr}) \times 60.6 \text{ lb/Kgal} / 72.0 \text{ mmBtu/hr} = 0.439 \text{ lb/mmBtu}$$

Therefore, the dryer burner is in compliance with 326 IAC 7-1.1-2.

329 IAC 13 (Used Oil Management)

The No.4 used oil burned in the aggregate dryer is not subject to regulation under the requirements specified in 329 IAC 13 (Used Oil Management), because pursuant to 329 IAC 13-3-2 (Used Oil Specifications), the No.4 used oil that will be burned at this source does not exceed the following allowable levels for specific constituents or properties:

Constituent or Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash Point	100 deg F minimum
Total Halogen	4,000 ppm maximum

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 in 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.

The compliance monitoring requirements applicable to this source are as follows:

The compliance monitoring requirements applicable to this source remain unchanged as a result of this minor permit revision.

Conclusion

The permit revision shall be added to the conditions of the FESOP as Minor Permit Revision No. 119-18153-05227.

CHANGES TO THE FESOP

The FESOP No. 119-16844-05227 has been modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.2 and D.1 are modified as follows:

- (a) one (1) portable asphalt drum-mix plant, with a maximum capacity of 300 tons per hour, equipped with one (1) #2 fuel oil fired aggregate dryer burner with a maximum rated capacity of 72 million British thermal units (MMBtu) per hour, using natural gas as a back up fuel **and No.4 used oil for energy recovery as an alternative fuel**, and one (1) baghouse for particulate control, exhausting at one (1) stack, identified as #1;

(2) Section D.1.5 is modified as follows:

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1][326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 72.0 million Btu per hour burner for the aggregate dryer shall be limited to 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using **No. 2** distillate oil.
- (b) **Pursuant to 326 IAC 7-1.1-2 (SO₂ Emissions Limitations) the SO₂ from the aggregate dryer burner shall not exceed one and six-tenths (1.6) pounds per mmBtu heat input when combusting #4 used oil.**
- (b c) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

(3) Section D.1.7 is added as follows:

D.1.7 Fuel Usage Limitations [326 IAC 2-8-11.1]

- (a) **The input of #4 used oil to the aggregate dryer burner shall be limited to 825.4 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month, such that the emissions of SO₂ and NO_x are limited to less than twenty five (25) tons per year, each.**
- (b) **For purposes of determining compliance based on SO₂ emissions, each 1,000 gallons of #2 fuel oil shall be equivalent to 30.18 gallons of #4 used oil.**

All conditions after D.1.7 were renumbered due to this addition.

(4) Condition D.1.15 is modified as follows:

D.1.15 16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5 ~~and~~ D.1.6, **and D.1.7**, the Permittee shall maintain records in accordance with (1) through (3) below. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel combusted during the period; and
.....
- (b) The Permittee shall maintain records sufficient to verify compliance with the procedures specified in condition D.1.10. Records shall be maintained for a period of five (5) years and shall be made available upon request by IDEM.
- (c) To document compliance with Condition D.1.14 ~~12~~, the Permittee shall maintain records of the once per shift visible emission notations of the drum mix dryer/burner baghouse stack exhaust, conveyors, and transfer points.
- (d) To document compliance with Condition D.1.42 ~~13~~, the Permittee shall maintain once per shift records of the total static pressure drop during normal operation.

- (e) To document compliance with Condition D.1.13 ~~14~~, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 ~~14~~.
- (f) To document compliance with Condition D.1.7 ~~8~~, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(5) Section D.16 is modified as follows:

D.1.16 17 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.6 **and D.1.7** shall be submitted to the address 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).

(6) A Quarterly Report for Condition D.1.7 is added as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE BRANCH**

No. 4 Used Oil Quarterly Report

Source Name: Dave O'Mara Contractor, Inc.
Initial Source Address: Hansen Aggregates, Fifth Street, North Vernon, Indiana 47265
Mailing Address: 1100 East O & M Avenue, North Vernon, Indiana 47265
FESOP No.: F119-16844-05227
Facility: Aggregate Dryer Burner
Parameter: #4 Used Oil Usage
Limit: Less than 825400 gallons per twelve (12) consecutive month period with compliance determined at the end of each month equivalent to less than twenty-five (25) tons per year of SO₂ and NO_x per year each. For purposes of determining compliance based on SO₂ emissions, each 1000 gallons of #2 fuel oil shall be equivalent to 30.18 gallons of #4 used oil.

YEAR: _____

Month	#4 Used Oil Usage (gallons)	#4 Used Oil Usage (gallons)	#4 Used Oil Usage (gallons)
	This Month	Previous 12 Months	12 Month Total
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.