



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 30, 2006
RE: A Asphalt / 163-18330-00020
FROM: Nisha Sizemore
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 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

**Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY
AND EVANSVILLE EPA
A-Asphalt Company, Inc.
6214 Oak Grove Road
Evansville, Indiana 47715**

(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. 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.

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.

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.: 163-18330-00020	
Issued by: Original Signed By: Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: October 30, 2006 Expiration Date: October 30, 2011

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]
A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS 6
B.1 Definitions [326 IAC 2-8-1]
B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6]
B.5 Severability [326 IAC 2-8-4(4)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.16 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]
B.17 Permit Renewal [326 IAC 2-8-3(h)]
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.20 Source Modification Requirement [326 IAC 2-8-11.1]
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.23 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]
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 16

Emission Limitations and Standards [326 IAC 2-8-4(1)]
C.1 Overall Source Limit [326 IAC 2-8]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.5 Fugitive Dust Emissions [326 IAC 6-4]
C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
C.7 Stack Height [326 IAC 1-7]
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.9 Performance Testing [326 IAC 3-6]

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

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)]
C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
C.13 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
- C.17 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.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Batch mix asphalt plant 24

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

- D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2]
- D.1.2 PSD Minor Limit [326 IAC 2-2]
- D.1.3 Particulate Matter Less Than 10 Microns In Diameter (PM-10) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]
- D.1.4 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2][326 IAC 7-2-1]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.7 Sulfur Dioxide Emissions and Sulfur Content
- D.1.8 Particulate Matter (PM)

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

- D.1.9 Visible Emissions Notations
- D.1.10 Parametric Monitoring
- D.1.11 Cyclone or Wet Scrubber Failure Detection

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

- D.1.12 Record Keeping Requirements

Certification Form 28

Emergency Occurrence Form 29

Quarterly Deviation and Compliance Monitoring Report Form 31

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville EPA (EEPA). 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 asphalt plant.

Authorized Individual:	Walter Woods, President
Source Address:	6214 Oak Grove Road, Evansville, IN 47715
Mailing Address:	6214 Oak Grove Road, Evansville, IN 47715
General Source Phone Number:	812-479-0855
SIC Code:	2951
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD, Emission Offset, and Nonattainment NSR Rules

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) asphalt batch mix dryer, identified as 001, constructed prior to 1973, capable of processing 60 tons per hour of aggregate, equipped with one (1) 16.2 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner (burning No. 4 distillate fuel oil or natural gas as backup fuels), using a cyclone and wet scrubber in series for particulate control (ID CE001A), exhausting at one (1) stack (ID No. S/V-001).

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
 - (1) one (1) asphalt hot oil heater, identified as 004, with a maximum capacity of 1.2 mmBtu per hour.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4][326 IAC 6-5]
- (d) Activities or categories of activities with individual and combined HAP emissions less than insignificant thresholds:
 - (1) one (1) 10,000 gallon asphalt storage tank (ID No. T001), constructed prior to 1984,
 - (2) one (1) 1,100 gallon #2 Fuel Oil storage tank (ID No. T002), constructed prior to 1984,
 - (3) one (1) 600 gallon #2 Fuel Oil storage tank (ID No. T003), constructed prior to 1984, and
 - (4) one (1) 600 gallon gasoline storage tank (ID No. T004), constructed prior to 1984.

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).

SECTION B GENERAL CONDITIONS

B.1 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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 163-18330-00020, 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 of this permit.
- (b) If IDEM, OAQ and EEPA, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ and EEPA, within a reasonable time, any information that IDEM, OAQ and EEPA 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and EEPA 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.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and EEPA 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.9 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 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 no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

- (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 and EEPA 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, as IDEM, OAQ and EEPA may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 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) A copy of the PMPs shall be submitted to IDEM, OAQ and EEPA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and EEPA. IDEM, OAQ and EEPA 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 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 describe 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, and EEPA and Southwest Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Evansville EPA phone: (812) 435-6145; fax: (812) 435-6155

Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and EEPA 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 and EEPA 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 163-18330-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 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.15 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 Provisions), 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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

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 independent 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 an "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.16 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 Federally Enforceable State Operating Permit 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 an "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, or EEPA 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, or EEPA 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, or EEPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or EEPA may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 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 EEPA 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 an "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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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, and EEPA on or before the date it is due.
- (c) 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 and EEPA 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 and EEPA any additional information identified as being needed to process the application.

B.18 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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

Any such application shall be certified by an "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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a 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 limitations provided in 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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and EEPA 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 emissions increases and decreases at 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.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification 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.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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, and EEPA 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.22 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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

The application which shall be submitted by the Permittee does require the certification by an "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.23 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable;
 - (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) 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (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.2 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 thirty percent (30%) 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.3 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.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 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.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 8, 1999. The plan is as follows:

Fugitive particulate matter emissions from plant roadways leading into and around the plant shall be controlled by watering, applying dust suppressant, paving or any other acceptable means.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

- (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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

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 an "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.

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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "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 and EEPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and EEPA 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 within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ and EEPa, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ and EEPA that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

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 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 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 an "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 or EEPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or EEPA 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(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
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713

- (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, and EEPa 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) one (1) asphalt batch mix dryer, identified as 001, constructed prior to 1973, capable of processing 60 tons per hour of aggregate, equipped with one (1) 16.2 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner (burning No. 4 distillate fuel oil or natural gas as backup fuels), using a cyclone and wet scrubber in series for particulate control (ID CE001A), exhausting at one (1) stack (ID No. S/V-001).

(The information describing the process contained in this emissions unit 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 (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the aggregate mixing and drying operation (Emission Unit ID 001) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.2 PSD Minor Limit [326 IAC 2-2]

Particulate matter emissions from the aggregate mixing and drying operation (Emission Unit ID 001) shall not exceed 0.9205 pound PM per ton of asphalt mix.

This limits total source-wide PM emissions to less than 250 tons per year. Therefore, compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Particulate Matter Less Than 10 Microns In Diameter (PM-10) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, particulate matter less than 10 microns in diameter emissions from the aggregate mixing and drying operation (Emission Unit ID 001) shall not exceed 0.3715 pound of PM-10 per ton of asphalt mix. Compliance with this limit will satisfy 326 IAC 2-8-4 and render the requirements of Part 70 (326 IAC 2-7), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and the Non-attainment New Source Review requirements under 326 IAC 2-1.1-5 not applicable.

D.1.4 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2][326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 16.2 MMBtu 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 percent when using distillate oil.
- (b) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.5 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 any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 60 days after issuance of this permit or five (5) years after the most recent IDEM approved test, whichever is later, in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM and PM-10 testing for the batch mix dryer and burner cyclone and wet scrubber stack exhaust 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.4 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 or No. 4 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 16.2 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.

D.1.8 Particulate Matter (PM)

In order to comply with conditions D.1.1, D.1.2, and D.1.3, the cyclone and wet scrubber for PM and PM10 control shall be in operation and control emissions at all times when the aggregate mixing and drying operation (Emission Unit ID 001) is in operation.

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

D.1.9 Visible Emissions Notations

- (a) Daily visible emission notations of the batch mix dryer and burner cyclone and wet scrubber stack exhaust and the conveying, material transfer points, and screening, shall be performed during normal daylight operations when exhausting to the atmosphere. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

- (a) The Permittee shall record the air flow rate across the cyclone used in conjunction with the aggregate drying operation, at least once daily when the aggregate drying operation is in operation when venting to the atmosphere. When for any one reading, the air flow rate across the cyclone is less than 14,929 acfm or a flow rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is less than the above mentioned flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall record the flow rate across the wet scrubber used in conjunction with the aggregate drying operation, at least once daily when the aggregate drying operation is in operation when venting to the atmosphere. When for any one reading, the flow rate of the wet scrubber is less than 70 gallons per minute or a flow rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is less than the above mentioned flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the flow rates shall comply with Section C - 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.1.11 Cyclone or Wet Scrubber Failure Detection

In the event that cyclone or wet scrubber failure has been observed:

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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) The Permittee shall maintain records sufficient to verify compliance with the procedures specified in condition D.1.7. Records shall be maintained for a period of five (5) years and shall be made available upon request by IDEM, OAQ.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the batch mix dryer and burner cyclone and wet scrubber stack exhaust and the conveying, material transfer points, and screening.

- (c) To document compliance with Condition D.1.10, the Permittee shall maintain daily records of the air flow rate across the cyclone and the flow rate across the wet scrubber used in conjunction with the aggregate drying operation during normal operation.
- (d) 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
And
EVANSVILLE EPA**

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

Source Name: A-Asphalt Company, Inc.
Source Address: 6214 Oak Grove Road, Evansville, Indiana 47715
Mailing Address: 6214 Oak Grove Road, Evansville, Indiana 47715
FESOP No.: F163-18330-00020

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
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
EVANSVILLE EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, IN 47713
Phone: 812-435-6145
Fax: 812-435-6155**

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

Source Name: A-Asphalt Company, Inc.
Source Address: 6214 Oak Grove Road, Evansville, Indiana 47715
Mailing Address: 6214 Oak Grove Road, Evansville, Indiana 47715
FESOP No.: F163-18330-00020

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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, PM-10, 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
And
EVANSVILLE EPA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: A-Asphalt Company, Inc.
Source Address: 6214 Oak Grove Road, Evansville, Indiana 47715
Mailing Address: 6214 Oak Grove Road, Evansville, Indiana 47715
FESOP No.: F163-18330-00020

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**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:	A-Asphalt Company, Inc.
Source Location:	6214 Oak Grove Road, Evansville, Indiana 47715
County:	Vanderburgh
SIC Code:	2951
Operation Permit No.:	163-10847-00020
Operation Permit Issuance Date:	November 22, 1999
Permit Renewal No.:	163-18330-00020
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from A-Asphalt Company, Inc. relating to the operation of a stationary batch mix asphalt plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) one (1) asphalt batch mix dryer, identified as 001, constructed prior to 1973, capable of processing 60 tons per hour of aggregate, equipped with one (1) 16.2 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner (burning No. 4 distillate fuel oil or natural gas as backup fuels), using a cyclone and wet scrubber in series for particulate control (ID CE001A), exhausting at one (1) stack (ID No. S/V-001).

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
 - (1) one (1) asphalt hot oil heater, identified as 004, with a maximum capacity of 1.2 mmBtu per hour.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4][326 IAC 6-5]
- (d) Activities or categories of activities with individual and combined HAP emissions less than insignificant thresholds:
 - (1) one (1) 10,000 gallon asphalt storage tank (ID No. T001), constructed prior to 1984,
 - (2) one (1) 1,100 gallon #2 Fuel Oil storage tank (ID No. T002), constructed prior to 1984,

- (3) one (1) 600 gallon #2 Fuel Oil storage tank (ID No. T003), constructed prior to 1984, and
- (4) one (1) 600 gallon gasoline storage tank (ID No. T004), constructed prior to 1984.

Existing Approvals

The source has been operating under the previous FESOP 163-10847-00020 issued on November 22, 1999, and the following amendments and revisions:

- (a) FESOP Reopening No. 163-13113-00020, issued on September 21, 2001.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 163-10847-00020 issued on November 22, 1999

Condition D.1.1:

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the aggregate drying operation shall not exceed 46.29 pounds per hour when operating at a process weight rate of 60 tons per hour.

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

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

Reason not incorporated: The particulate matter emissions from the aggregate mixing and drying operation are subject to the requirements of 326 IAC 6.5-1-2(a) (Particulate matter limitations except Lake County) (formerly 326 IAC 6-1-2) because this source is located in one of the counties listed in 326 IAC 6.5-1-1(a) and potential particulate matter (PM) emissions exceed 100 tons per year. Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the aggregate mixing and drying operation (Emission Unit ID 001) are limited to 0.03 grains per dry standard cubic foot (gr/dscf). This limit was erroneously not included in the original FESOP.

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if the limitation established in the rule is less stringent than applicable limitation established in 326 IAC 6.5. Since the applicable PM emission limit established by 326 IAC 6.5-1-2 is less than the PM limit that would be established by 326 IAC 6-3-2 (46.29 pounds per hour, see Appendix A, page 8 of 8), the more stringent limit applies and the limit pursuant to 326 IAC 6-3-2 does not apply to the aggregate mixing and drying operation.

Enforcement Issue

IDEM, OAQ is aware that the Permittee failed to perform PM and PM10 stack testing during the period between 30 and 36 months after issuance of the FESOP as required in condition D.1.6 of FESOP 163-10847-00020 issued on November 22, 1999. IDEM is reviewing this matter and will take appropriate action.

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 December 15, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission 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	8,420.22
PM-10	1,189.17
SO ₂	40.68
VOC	6.79
CO	6.81
NO _x	10.89

HAPs	Unrestricted Potential Emissions (tons/yr)
Arsenic	Less than 10
Acetaldehyde	Less than 10
Benzene	Less than 10
Beryllium	Less than 10
Cadmium	Less than 10
Chromium	Less than 10
Ethylbenzene	Less than 10
Formaldehyde	Less than 10
Phenol	Less than 10
Quinone	Less than 10
Lead	Less than 10
Manganese	Less than 10
Mercury	Less than 10
Nickel	Less than 10
Selenium	Less than 10
Toluene	Less than 10
PAHs	Less than 10
Xylene	Less than 10
Total	Less than 25

- (a) The unrestricted potential emissions of PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. 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 FESOP 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.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Aggregate Drying and Mixing	241.91 ⁽¹⁾	97.63 ⁽²⁾	38.01	2.54	5.96	10.14	0.72	2.00
Hot Oil heater	0.08	0.12	2.67	0.01	0.19	0.75	Negl.	Negl.
Conveying/Handling	0.62	0.30	--	--	--	--	--	--
Unpaved Roads	6.07	1.55	--	--	--	--	--	--
Aggregate Storage	0.02	0.01	--	--	--	--	--	--
Load-out and Silo filling	0.29	0.29	--	4.23	0.66	--	0.02	0.25
Total Emissions	248.99	99.9	40.68	6.78	6.81	10.89	0.72	2.25

- (1) PM emissions represent maximum allowable PM emissions such that source-wide PM emissions are limited to less than 250 tons per year to render the requirements of 326 IAC 2-2 (PSD) not applicable.
- (2) Maximum allowable PM10 emissions in order to comply with 326 IAC 2-8 (FESOP).

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM2.5	Nonattainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Vanderburgh County has been classified as attainment or unclassifiable in Indiana 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.
- (d) On August 7, 2006, a temporary emergency rule took effect redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Source Status

Existing Source FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	<250
PM-10	<100
SO ₂	<100
VOC	<100
CO	<100
NO _x	<100
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) The hot mix asphalt batch plant is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.90 through 60.93, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", because it was constructed prior to the applicability date of June 11, 1973.
- (b) The one (1) 10,000 gallon liquid asphalt storage tank (Tank 001), the one (1) 1,100 gallon #2 Fuel Oil storage tank (ID No. T002), the one (1) 600 gallon #2 Fuel Oil storage tank (ID No. T003) and the one (1) 600 gallon gasoline storage tank (ID No. T004) are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Part 60.110, Subpart K or 40 CFR Part 60.110a, Subpart Ka) "Standards of Performance for Storage Vessels for Petroleum Liquids" because each storage tank has a storage capacity of less than 40,000 gallons.
- (c) The one (1) 10,000 gallon liquid asphalt storage tank (Tank 001), the one (1) 1,100 gallon #2 Fuel Oil storage tank (ID No. T002), the one (1) 600 gallon #2 Fuel Oil storage tank (ID No. T003) and the one (1) 600 gallon gasoline storage tank (ID No. T004) are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" since each tank has a storage capacity of less than 75 cubic meters and each was installed prior to the applicability date of July 23, 1984.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

State Rule Applicability – Entire Source

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

This source was constructed prior to August, 1977 and has an unrestricted potential to emit for PM and PM-10 that meets the definition of "major PSD source" pursuant to 326 IAC 2-2-1(w)(2). However, the potential to emit of PM-10 is enforceably restricted to less than one hundred (100) tons per year such that 326 IAC 2-7 does not apply. See 326 IAC 2-8-4 (FESOP) below. In addition, particulate matter emissions from the aggregate mixing and drying operation (Emission Unit ID 001) shall not exceed 0.9205 pound PM per ton of asphalt mix. This is equivalent to a PM emission limit of 55.23 pounds per hour based on a maximum throughput of 60 tons of asphalt mix per hour. This limit, in combination with unrestricted PM emissions from all other emission units, limits total source-wide PM emissions to less than 250 tons per year. Therefore, the potential to emit of PM and PM-10 are enforceably restricted to less than the major source thresholds of 250 tons per year such that 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment NSR)

Vanderburgh County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. A-Asphalt Company, Inc. has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year.

Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following limits shall apply:

PM-10 emissions from the aggregate dryer shall be limited to 0.3715 pound PM-10 per ton of asphalt mix equivalent to 22.29 pounds per hour, based on a maximum throughput of 60 tons of asphalt mix per hour. This limit, in combination with unrestricted PM-10 emissions from all other emission units, limits source-wide PM-10 emissions to less than 100 tons per year. The source will comply with the PM-10 emission limit by utilizing a cyclone and wet scrubber in series for controlling PM-10 emissions to less than 22.29 pounds per hour from the aggregate dryer.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

326 IAC 6-4-1 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4-1, the source 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).

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

This batch mix hot mix asphalt plant is subject to 326 IAC 6-5, for a new source which has not received all the necessary preconstruction approvals before December 13, 1985. Pursuant to the rule, a fugitive dust plan must be submitted, reviewed and approved. The fugitive dust control plan for this source includes the following:

Fugitive particulate matter emissions from plant roadways leading into and around the plant shall be controlled by watering, applying dust suppressant, paving or any other acceptable means.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) asphalt hot oil heater, identified as 004, is not subject to the requirements of this rule because it is not a source of indirect heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The aggregate mixing and drying operation is not subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if the limitation established in the rule is less stringent than applicable limitation established in 326 IAC 6.5. Since the applicable PM emission limit established by 326 IAC 6.5-1-2 is less than the PM limit that would be established by 326 IAC 6-3-2 (46.29 pounds per hour, see Appendix A, page 8 of 8), the more stringent limit applies and the limit pursuant to 326 IAC 6-3-2 does not apply to the aggregate mixing and drying operation.

326 IAC 6.5-1-2 (Particulate Limitations)

The particulate matter emissions from the aggregate mixing and drying operation are subject to the requirements of 326 IAC 6.5-1-2(a) (Particulate matter limitations except Lake County) (formerly 326 IAC 6-1-2) because this source is located in one of the counties listed in 326 IAC 6.5-1-1(a) and potential particulate matter (PM) emissions exceed 100 tons per year. Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the aggregate mixing and drying operation (Emission Unit ID 001) are limited to 0.03 grains per dry standard cubic foot (gr/dscf). The source will comply with the PM emission limit by utilizing a cyclone and wet scrubber in series for controlling PM emissions to less than 0.03 gr/dscf.

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

This source is subject to the requirements of 326 IAC 7-1.1 because the potential to emit (PTE) of SO₂ is greater than the applicable level of 25 tons per year.

The sulfur dioxide emissions from the 16.2 MMBtu/hr dryer burning distillate oil shall be limited to 0.5 lb/MMBtu heat input. This equates to a fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the fuel must be less than or equal to 0.5% in order to comply with this rule (See Appendix A, Page 8 of 8 for detailed calculations). The source will comply with this rule by using No. 2 fuel oil or No. 4 fuel oil with a sulfur content of 0.5% or less.

The 1.2 MMBtu/hr hot oil heater is not subject to the requirements of this rule because potential SO₂ emissions from this unit are less than 25 tons per year.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

This source is subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Quality upon request records of sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates based on a calendar-month average.

326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving)

This rule applies to any paving application constructed after January 1, 1980 located anywhere in the state. 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 for any paving application except the following purposes:

- 1) penetrating prime coating
- 2) stockpile storage
- 3) application during the months of November, December, January, February and March.

This source currently does not use cutback asphalt or asphalt emulsion at this source. Any change or modification that would cause the source to begin using cutback asphalt or asphalt emulsion shall require prior approval from IDEM, OAQ.

Testing Requirements

Within 60 days after issuance of this permit or five (5) years after the most recent IDEM approved test, whichever is later, in order to demonstrate compliance with the emission limits pursuant to 326 IAC 6.5-1-2 and 326 IAC 2-8, and the emission limits that render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall perform PM and PM-10 testing for the batch mix dryer and burner cyclone and wet scrubber stack exhaust 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C-Performance Testing.

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:

1. The conveying, material transfer points, screening, and mixing and drying have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the batch mix dryer and burner cyclone and wet scrubber stack exhaust and the conveying, material transfer points, and screening, shall be performed during normal daylight operations when exhausting to the atmosphere. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (f) The Permittee shall record the air flow rate across the cyclone used in conjunction with the aggregate drying operation, at least once daily when the aggregate drying operation is in operation when venting to the atmosphere. When for any one reading, the air flow rate across the cyclone is less than 14,929 acfm or a flow rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is less than the above mentioned flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (g) The Permittee shall record the flow rate across the wet scrubber used in conjunction with the aggregate drying operation, at least once daily when the aggregate drying operation is in operation when venting to the atmosphere. When for any one reading, the flow rate of the wet scrubber is less than 70 gallons per minute or a flow rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is less than the above mentioned flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

- (h) In the event that cyclone or wet scrubber failure has been observed:

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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclone and wet scrubber for the aggregate drying operation must operate properly to ensure compliance with 326 IAC 6.5-1-2 (Particulate Limitations), to ensure compliance with the PM and PM10 emission limits that render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, and to comply with 326 IAC 2-8 (FESOP).

Conclusion

The operation of this stationary batch mix asphalt plant shall be subject to the conditions of the FESOP 163-18330-00020.

Appendix A to the Technical Support Document

Appendix A: Emission Calculations Operation Permit No.- **F163-18330** Plant I D **163-00020**

Company Name: A-Asphalt Company, Inc.
 Plant Location: 6214 Oak Grove Road, Evansville, Indiana 47715
 County: Vanderburgh
 Permit Reviewer: Trish Earls

** aggregate dryer burner**

The following calculations determine the amount of emissions created by natural gas combustion, from the aggregate dryer burner, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant: $\frac{16.2 \text{ MMBtu/hr} * 8,760 \text{ hr/yr}}{1000 \text{ Btu/cf} * 2,000 \text{ lb/ton}}$ * Ef (lb/MMcf) = (ton/yr)

P M:	1.9 lb/MMcf =	0.13 ton/yr
P M-10:	7.6 lb/MMcf =	0.54 ton/yr
S O 2:	0.6 lb/MMcf =	0.04 ton/yr
N O x:	100.0 lb/MMcf =	7.10 ton/yr
V O C:	5.5 lb/MMcf =	0.39 ton/yr
C O:	84.0 lb/MMcf =	5.96 ton/yr

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ **0.50** % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant: $\frac{16.2 \text{ MMBtu/hr} * 8,760 \text{ hr/yr}}{140,000 \text{ Btu/gal} * 2,000 \text{ lb/ton}}$ * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0 lb/1000 gal =	1.01 ton/yr
P M-10:	3.3 lb/1000 gal =	1.67 ton/yr
S O 2:	71.0 lb/1000 gal =	35.98 ton/yr
N O x:	20.0 lb/1000 gal =	10.14 ton/yr
V O C:	0.34 lb/1000 gal =	0.17 ton/yr
C O:	5.0 lb/1000 gal =	2.53 ton/yr

The following calculations determine the amount of emissions created by the combustion of #4 fuel oil @ **0.50** % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant: $\frac{16.2 \text{ MMBtu/hr} * 8,760 \text{ hr/yr}}{140,000 \text{ Btu/gal} * 2,000 \text{ lb/ton}}$ * Ef (lb/1,000 gal) = (ton/yr)

P M:	7.0 lb/1000 gal =	3.55 ton/yr
P M-10:	8.5 lb/1000 gal =	4.31 ton/yr
S O 2:	75.0 lb/1000 gal =	38.01 ton/yr
N O x:	20.0 lb/1000 gal =	10.14 ton/yr
V O C:	0.34 lb/1000 gal =	0.17 ton/yr
C O:	5.0 lb/1000 gal =	2.53 ton/yr

The maximum potential emissions from the aggregate dryer burner due to fuel combustion are the following:

Criteria Pollutant:	Emissions (ton/yr)	Worst Case Fuel
P M:	3.55 ton/yr	No. 4 Fuel Oil
P M-10:	4.31 ton/yr	No. 4 Fuel Oil
S O 2:	38.01 ton/yr	No. 4 Fuel Oil
N O x:	10.14 ton/yr	No. 2 or No. 4 Fuel Oil
V O C:	0.39 ton/yr	Natural Gas
C O:	5.96 ton/yr	Natural Gas

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

hot oil heater

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ 0.50 % sulfur, from hot oil heater, based on 8760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant:	$\frac{1.2 \text{ MMBtu/hr} * 8,760 \text{ hr/yr}}{140,000 \text{ Btu/gal} * 2,000 \text{ lb/ton}}$	* Ef (lb/1,000 gal) = (ton/yr)
P M:	2.0 lb/1000 gal =	0.08 ton/yr
P M-10:	3.3 lb/1000 gal =	0.12 ton/yr
S O 2:	71.0 lb/1000 gal =	2.67 ton/yr
N O x:	20.0 lb/1000 gal =	0.75 ton/yr
V O C:	0.34 lb/1000 gal =	0.01 ton/yr
C O:	5.0 lb/1000 gal =	0.19 ton/yr

** aggregate drying: batch-mix plant **

The following calculations determine the amount of worst case emissions created by aggregate drying before controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Tables 11.1-1 and 11.1-6 for a batch mix dryer which has the capability of combusting fuel oil:

Pollutant:	Ef	lb/ton x	60	ton/hr x	8,760	hr/yr
			2,000	lb/ton		
Criteria Pollutant:						
P M:		32	lb/ton =			8,409.60 ton/yr
P M-10:		4.5	lb/ton =			1,182.60 ton/yr
VOC:		8.20E-03	lb/ton =			2.15 ton/yr

The VOC emission factor for aggregate drying was obtained from U.S. EPA's AP-42, 5th Edition, Section 11.1, Table 11.1-6.

** conveying / handling **

The following calculations determine the amount of emissions created by material handling, based on 8,760 hours of use and AP-42, Section 13.2.4, Equation 1. The emission factor for calculating PM emissions is calculated as follows:

PM-10 Emissions:

$$E = k * (0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4})$$

$$= 1.12E-03 \text{ lb PM-10/ton}$$

$$= 2.37E-03 \text{ lb PM/ton}$$

where k = 0.35 (particle size multiplier for <10um)
0.74 (particle size multiplier for <30um)
U = 12 mph mean wind speed
M = 4.5 material moisture content (%)

$$\frac{60 \text{ ton/hr}}{2,000 \text{ lb/ton}} * 8,760 \text{ hrs/yr} * \text{Ef (lb/ton of material)} = (\text{ton/yr})$$

Total PM 10 Emissions: 0.30 tons/yr
Total PM Emissions: 0.62 tons/yr

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

** unpaved roads **

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.2.

$$\begin{aligned}
 & 8.57 \text{ trip/hr} \times \\
 & 0.0568 \text{ mile/trip} \times \\
 & 2 \text{ (round trip) } \times \\
 & 8,760 \text{ hr/yr} = \qquad \qquad \qquad 8528.31552 \text{ miles per year}
 \end{aligned}$$

$$\begin{aligned}
 E_f &= k \cdot [(s/12)^a] \cdot [(W/3)^b] \cdot [(365-p)/365] \cdot (S/15) \\
 &= 0.36 \text{ lb PM-10/mile} \\
 &= 1.42 \text{ lb PM/mile}
 \end{aligned}$$

where k = 1.5 (particle size multiplier for PM-10) (k=4.9 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
a = 0.9 Constant for PM-10 (a = 0.7 for PM-30 or TSP)
b = 0.45 Constant for PM-10 and for PM-30 or TSP
W = 5.0 tons average weight of all vehicles traveling the road
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

$$\text{PM-10: } \frac{0.36 \text{ lb/mi} \times 8528.3155 \text{ mi/yr}}{2000 \text{ lb/ton}} = 1.55 \text{ tons/yr}$$

$$\text{PM: } \frac{1.42 \text{ lb/mi} \times 8528.3155 \text{ mi/yr}}{2000 \text{ lb/ton}} = 6.07 \text{ tons/yr}$$

Total PM Emissions From Paved Roads = 6.07 tons/yr

Total PM-10 Emissions From Paved Roads = 1.55 tons/yr

** storage **

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$$\begin{aligned}
 E_f &= 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15) \\
 &= 5.56 \text{ lb/acre/day}
 \end{aligned}$$

where s = 4.8 % silt
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

$$\begin{aligned}
 E_p \text{ (storage)} &= \frac{E_f \cdot sc \cdot (20 \text{ cuft/ton}) \cdot (365 \text{ day/yr})}{(2,000 \text{ lb/ton}) \cdot (43,560 \text{ sqft/acre}) \cdot (12 \text{ ft})} \\
 \text{where } sc &= 400 \text{ tons storage capacity}
 \end{aligned}$$

PM = 0.02 tons/yr P M-10: 35% of PM = 0.01 tons/yr

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

** load-out **

The following calculations determine the amount of emissions created by plant load-out, based on 8,760 hours of use and USEPA's AP-42, Section 11.1, Tables 11.1-14 through 11.1-16.

$$\begin{aligned}
 \text{PM/PM10 Ef} &= 0.000181 + 0.00141(-V)e((0.0251)(T+460)-20.43) \\
 &= 5.22E-04 \text{ lb PM or PM-10 per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{PM/PM10} &= \mathbf{0.14 \text{ tons/yr}} \\
 \text{Total PAH HAPs} &= \mathbf{0.01 \text{ tons/yr}} \quad (5.93\% \text{ of Organic PM emissions per AP-42})^* \\
 \text{Phenol} &= \mathbf{0.00 \text{ tons/yr}} \quad (1.18\% \text{ of Organic PM emissions per AP-42})^*
 \end{aligned}$$

$$\begin{aligned}
 \text{TOC Ef} &= 0.0172(-V)e((0.0251)(T+460)-20.43) \\
 &= 4.16E-03 \text{ lb TOC per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{VOC} &= \mathbf{1.03 \text{ tons/yr}} \quad (94\% \text{ of TOC emissions per AP-42)} \\
 \text{Worst Case Single HAP (Xylenes)} &= \mathbf{0.01 \text{ tons/yr}} \quad (0.49\% \text{ of TOC emissions per AP-42)} \\
 \text{Total Volatile HAPs} &= \mathbf{0.02 \text{ tons/yr}} \quad (1.5\% \text{ of TOC emissions per AP-42)}
 \end{aligned}$$

$$\begin{aligned}
 \text{CO Ef} &= 0.00558(-V)e((0.0251)(T+460)-20.43) \\
 &= 1.35E-03 \text{ lb CO per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{CO} &= \mathbf{0.35 \text{ tons/yr}}
 \end{aligned}$$

** silo filling **

The following calculations determine the amount of emissions created by silo filling, based on 8,760 hours of use and USEPA's AP-42, Section 11.1, Tables 11.1-14 through 11.1-16.

$$\begin{aligned}
 \text{PM/PM10 Ef} &= 0.000332 + 0.00105(-V)e((0.0251)(T+460)-20.43) \\
 &= 5.86E-04 \text{ lb PM or PM-10 per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{PM/PM10} &= \mathbf{0.15 \text{ tons/yr}} \\
 \text{Total PAH HAPs} &= \mathbf{0.01 \text{ tons/yr}} \quad (11.40\% \text{ of Organic PM emissions per AP-42})^*
 \end{aligned}$$

$$\begin{aligned}
 \text{TOC Ef} &= 0.0504(-V)e((0.0251)(T+460)-20.43) \\
 &= 1.22E-02 \text{ lb TOC per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{VOC} &= \mathbf{3.20 \text{ tons/yr}} \quad (100\% \text{ of TOC emissions per AP-42)} \\
 \text{Worst Case Single HAP (Formaldehyde)} &= \mathbf{0.02 \text{ tons/yr}} \quad (0.69\% \text{ of TOC emissions per AP-42)} \\
 \text{Total Volatile HAPs} &= \mathbf{0.04 \text{ tons/yr}} \quad (1.3\% \text{ of TOC emissions per AP-42)}
 \end{aligned}$$

$$\begin{aligned}
 \text{CO Ef} &= 0.00488(-V)e((0.0251)(T+460)-20.43) \\
 &= 1.18E-03 \text{ lb CO per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)} \\
 \text{CO} &= \mathbf{0.31 \text{ tons/yr}}
 \end{aligned}$$

* Organic PM emissions are calculated using the equation from Table 11.1-14.

$$\begin{aligned}
 \text{Organic PM Ef} &= 0.00141(-V)e((0.0251)(T+460)-20.43) \\
 &= 3.41E-04 \text{ lb PM or PM-10 per ton of asphalt mix produced} \\
 \text{where V} &= -0.5 \text{ asphalt volatility (default value of -0.5 used per AP-42)} \\
 \text{T} &= 325 \text{ hot mix asphalt (HMA) mix temperature in degrees F (default value of 325 used per AP-42)}
 \end{aligned}$$

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

**** summary of source emissions before controls ****

Criteria Pollutants:	P M:	8,420.22 ton/yr
	P M-10:	1,189.17 ton/yr
	S O 2:	40.68 ton/yr
	N O x:	10.89 ton/yr
	V O C:	6.79 ton/yr
	C O:	6.81 ton/yr

**** source emissions after controls ****

hot oil heater:		nonfugitive	
P M:	0.08 ton/yr x	100.00% emitted after controls =	0.08 ton/yr
P M-10:	0.12 ton/yr x	100.00% emitted after controls =	0.12 ton/yr
aggregate drying:		nonfugitive	
P M:	8,413.15 ton/yr x	0.40% emitted after controls =	33.65 ton/yr
P M-10:	1,186.91 ton/yr x	0.40% emitted after controls =	4.75 ton/yr
VOC:	2.15 ton/yr x	100.00% emitted after controls =	2.15 ton/yr
conveying/handling:		fugitive	
P M:	0.62 ton/yr x	50% emitted after controls =	0.31 ton/yr
P M-10:	0.30 ton/yr x	50% emitted after controls =	0.15 ton/yr
unpaved roads:		fugitive	
P M:	6.07 ton/yr x	50% emitted after controls =	3.03 ton/yr
P M-10:	1.55 ton/yr x	50% emitted after controls =	0.77 ton/yr
storage piles:		fugitive	
P M:	0.02 ton/yr x	50% emitted after controls =	0.01 ton/yr
P M-10:	0.01 ton/yr x	50% emitted after controls =	0.00 ton/yr
load-out & silo filling:		fugitive	
P M:	0.29 ton/yr x	100% emitted after controls =	0.29 ton/yr
P M-10:	0.29 ton/yr x	100% emitted after controls =	0.29 ton/yr
VOC:	4.23 ton/yr x	100% emitted after controls =	4.23 ton/yr
CO:	0.66 ton/yr x	100% emitted after controls =	0.66 ton/yr

**** summary of source emissions after controls ****

Criteria Pollutant:	Non-Fugitive	Fugitive	Total
PM:	33.73 ton/yr	3.65 ton/yr	37.37 ton/yr
PM-10:	4.87 ton/yr	1.21 ton/yr	6.09 ton/yr
S O 2:	40.68 ton/yr	0.00 ton/yr	40.68 ton/yr
N O x:	10.89 ton/yr	0.00 ton/yr	10.89 ton/yr
V O C:	2.56 ton/yr	4.23 ton/yr	6.79 ton/yr
C O:	6.15 ton/yr	0.66 ton/yr	6.81 ton/yr

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

Hazardous Air Pollutants (HAPs)

** aggregate dryer burner**

The following calculations determine the amount of HAP emissions created by the combustion of distillate fuel oil before & after controls @ 0.50 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Table 1.3-10.

Hazardous Air Pollutants (HAPs):

	<u>16.2 MMBtu/hr * 8760 hr/yr</u>				* Ef (lb/10 ¹² Btu) = (ton/yr)
	2,000 lb/ton				
				Potential To Emit	Limited Emissions
Arsenic:	4 lb/10 ¹² Btu =			2.84E-04 ton/yr	1.1E-06 ton/yr
Beryllium:	3 lb/10 ¹² Btu =			2.13E-04 ton/yr	8.5E-07 ton/yr
Cadmium:	3 lb/10 ¹² Btu =			2.13E-04 ton/yr	8.5E-07 ton/yr
Chromium:	3 lb/10 ¹² Btu =			2.13E-04 ton/yr	8.5E-07 ton/yr
Lead:	9 lb/10 ¹² Btu =			6.39E-04 ton/yr	2.6E-06 ton/yr
Manganese:	6 lb/10 ¹² Btu =			4.26E-04 ton/yr	1.7E-06 ton/yr
Mercury:	3 lb/10 ¹² Btu =			2.13E-04 ton/yr	8.5E-07 ton/yr
Nickel:	3 lb/10 ¹² Btu =			2.13E-04 ton/yr	8.5E-07 ton/yr
Selenium:	15 lb/10 ¹² Btu =			1.06E-03 ton/yr	4.3E-06 ton/yr
	Total HAPs =			3.48E-03 ton/yr	1.4E-05 ton/yr

** aggregate drying: batch-mix plant **

The following calculations determine the amount of HAP emissions created by aggregate drying before & after controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Table 11.1-9 for a batch mix dryer which can be fired with natural gas or fuel oil.

Pollutant:

	Ef	lb/ton x	<u>60</u>	ton/hr x	8760 hr/yr
			2000	lb/ton	

Hazardous Air Pollutants (HAPs):

				Potential To Emit	Limited Emissions
Acetaldehyde:	3.2E-04	lb/ton =		0.08 ton/yr	0.08 ton/yr
Benzene:	2.8E-04	lb/ton =		0.07 ton/yr	0.07 ton/yr
Ethylbenzene:	2.2E-03	lb/ton =		0.58 ton/yr	0.58 ton/yr
Formaldehyde:	7.4E-04	lb/ton =		0.19 ton/yr	0.19 ton/yr
Quinone:	2.7E-04	lb/ton =		0.07 ton/yr	0.07 ton/yr
Toluene:	1.0E-03	lb/ton =		0.26 ton/yr	0.26 ton/yr
Total PAH Haps:	1.1E-04	lb/ton =		0.03 ton/yr	0.03 ton/yr
Xylene:	2.7E-03	lb/ton =		0.71 ton/yr	0.71 ton/yr
	Total HAPs =			2.00 ton/yr	2.00 ton/yr

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

**** summary of source HAP emissions potential to emit ****

Hazardous Air Pollutants (HAPs):

Arsenic:	0.000 ton/yr
Acetaldehyde:	0.084 ton/yr
Benzene:	0.074 ton/yr
Beryllium:	0.000 ton/yr
Cadmium:	0.000 ton/yr
Chromium:	0.000 ton/yr
Ethylbenzene:	0.578 ton/yr
Formaldehyde:	0.217 ton/yr
Quinone:	0.071 ton/yr
Lead:	0.001 ton/yr
Manganese:	0.000 ton/yr
Mercury:	0.000 ton/yr
Nickel:	0.000 ton/yr
Phenol:	0.001 ton/yr
Selenium:	0.001 ton/yr
Toluene:	0.263 ton/yr
Total PAH:	0.044 ton/yr
Xylene:	0.715 ton/yr
Other organic HAPs from load-out and silo filling:	0.200 ton/yr
Total:	2.250 ton/yr

**** summary of source HAP limited emissions ****

Hazardous Air Pollutants (HAPs):

Arsenic:	1.1E-06 ton/yr
Acetaldehyde:	0.08 ton/yr
Benzene:	0.07 ton/yr
Beryllium:	8.5E-07 ton/yr
Cadmium:	8.5E-07 ton/yr
Chromium:	8.5E-07 ton/yr
Ethylbenzene:	0.578 ton/yr
Formaldehyde:	0.217 ton/yr
Quinone:	0.071 ton/yr
Lead:	0.000 ton/yr
Manganese:	1.7E-06 ton/yr
Mercury:	8.5E-07 ton/yr
Nickel:	8.5E-07 ton/yr
Phenol:	1.1E-03 ton/yr
Selenium:	4.3E-06 ton/yr
Toluene:	0.26 ton/yr
Total PAH:	0.04 ton/yr
Xylene:	0.71 ton/yr
Other organic HAPs from load-out and silo filling:	0.200 ton/yr
Total:	2.247 ton/yr

(total includes additional HAPs from load-out and silo filling not shown)

Appendix A to the Technical Support Document

A-Asphalt Company, Inc.
Evansville, Indiana

Operation Permit No. F163-18330
Plant I D 163-00020

** miscellaneous **

326 IAC 7 Compliance Calculations:

The following calculations determine the maximum sulfur content of distillate fuel oil allowable by 326 IAC 7:

$$\begin{array}{rcl}
 0.5 \text{ lb/MMBtu} \times 140,000 \text{ Btu/gal} & = & 70 \text{ lb/1000gal} \\
 70 \text{ lb/1000gal} / 142 \text{ lb/1000 gal} & = & 0.5 \% \\
 \text{Sulfur content must be less than or equal to} & & 0.5\% \text{ to comply with 326 IAC 7.}
 \end{array}$$

326 IAC 6-3-2 Compliance Calculations:

The following calculations determine compliance with 326 IAC 6-3-2 for process weight rates in excess of 30 tons per hour:

$$\text{limit} = 55 * (60 ^{0.11}) - 40 = 46.29 \text{ lb/hr or } 202.75 \text{ ton/yr}$$

Since the emission limit pursuant to 326 IAC 6.5-1-2 is more stringent than this limit, the limit pursuant to 326 IAC 6-3-2 does not apply. The emission limit pursuant to 326 IAC 6.5-1-2 shall also render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

PM-10 Emission Limit for Aggregate Dryer to comply with 326 IAC 2-8 (FESOP):

$$\begin{array}{rcl}
 (99.9 \text{ tons PM-10/yr} - 2.27 \text{ tons PM-10/yr from other sources}) & & \\
 = 97.63 \text{ tons PM-10/yr} & = & 22.29 \text{ lbs/hr}
 \end{array}$$

PM-10 emissions from the aggregate dryer are controlled to 1.08 lbs/hr < 22.29 lbs/hr (Will comply)

Based on a maximum asphalt mix throughput of 60 tons/hr, this emission limit is equivalent to 0.3715 lb PM10 per ton of asphalt mix.

PM Emission Limit for Aggregate Dryer to render 326 IAC 2-2 (PSD) not applicable:

$$\begin{array}{rcl}
 (249 \text{ tons PM/yr} - 7.08 \text{ tons PM/yr from other sources}) & & \\
 = 241.92 \text{ tons PM-10/yr} & = & 55.23 \text{ lbs/hr}
 \end{array}$$

PM emissions from the aggregate dryer are controlled to 33.65 tons/yr < 241.92 tons/yr (Will comply)

Based on a maximum asphalt mix throughput of 60 tons/hr, this emission limit is equivalent to 0.9205 lb PM per ton of asphalt mix.