

July 30, 2007



Mr. Van Medlock  
Irvin-Rogers Brick & Block, LLC  
421 Great Circle Road  
Nashville, TN 37228

CERTIFIED MAIL #: 7007 0220 0002 7444 4023

Re: Source Specific Operation Status (SSOA)  
Irvin-Rogers Brick & Block, LLC  
S097-23241-00590

Dear Mr. Medlock:

Your application for the Source Specific Operation Status was received on July 20, 2007 and has been reviewed. Based on the submitted data and the provisions in 326 IAC 2, it has been determined that your emission source, a Stationary Ready-Mix Concrete Batch operation, with a Standard Industrial Classification (SIC) code of 3271 (Concrete Block and Brick), located at 2301 Hawthorne Lane, Indianapolis, Indiana 46218, has met the criteria under 326 IAC 2-9 required to obtain a Source Specific Operating Agreement.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter.

The facilities and processes of this source are hereby granted the Source Specific Operating Agreement provided that the following requirements of 326 IAC 2-9 are satisfied:

**Section A: Ready-Mix Concrete Batch Operation: [326 IAC 2-9-9]**

1. The production from the concrete batch operation shall be limited to less than three hundred thousand (300,000) cubic yards per year.
2. The source shall keep annual production records of the concrete batch operation at the site on a calendar year basis. These records shall be maintained for a minimum period of five (5) years, and made available upon request of the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES).
3. All equipment that generate particulate matter (PM) emissions and any associated control devices shall be operated and maintained at all times of plant operation, in such a manner, as to meet all of the requirements of this Source Specific Operating Agreement.
4. Fugitive particulate emissions from the cement and aggregate silos shall be controlled by operating dust collectors such that visible emissions do not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. Compliance with this condition shall be determined by 40 CFR 60, Appendix A, Method 9.
5. The fugitive particulate matter (PM) emissions from all aggregate storage piles, unpaved roadways, and aggregate transfer processes of this source shall be controlled by applying water on an as needed basis, such that the following visible emission conditions are met:
  - (a) The visible emissions from any storage pile shall not exceed twenty percent (20%) in twenty-four

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Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
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TDD 327-5186  
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(24) consecutive readings in a six (6) minute period. This limitation shall not apply during periods when application of control measures are ineffective or unreasonable due to sustained high wind speeds. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

(b) The visible emissions from unpaved roadways shall not exceed an average instantaneous opacity of twenty percent (20%). Average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

- (i) The first reading shall be taken at the time of emission generation.
- (ii) The second reading shall be taken five (5) seconds after the first.
- (iii) The third reading shall be taken five (5) seconds after the second reading, or ten (10) seconds after the first reading.

The three (3) readings shall be taken approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

(c) Visible emissions from the aggregate transferring processes shall not exceed an average instantaneous opacity of twenty percent (20%). The average instantaneous opacity shall be the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) material loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

6. All cement transferring processes shall always be enclosed.
7. The source shall maintain records on the types of air pollution control devices used at the source and the operation and maintenance manuals for those control devices.
8. The fugitive particulate emissions at the sand and gravel operation shall not escape beyond the property lines or boundaries of the source property, right of way, or easement on which the source is located pursuant to 326 IAC 6-4.

**Section B: General Requirements: [326 IAC 2-9-1]**

1. The source shall provide an annual notice to the IDEM commissioner and OES administrator, stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
MC 61-53 IGCN 1003  
100 North Senate Avenue  
Indianapolis, IN 46204**

and

**Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the IDEM, OAQ and OES under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,



Felicia A. Robinson  
Administrator

BG

cc: File  
Marion County Health Department  
Air Compliance Section - Matt Mosier  
OAQ

Irvin-Rogers Brick & Block  
Mr. John Frazzini  
P.O. Box 19783  
Indianapolis, IN 46219

<b>Source Specific Operating Agreement Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-9.

<b>Company Name:</b>	Irvin-Rogers Brick & Block, LLC
<b>Address:</b>	2301 Hawthorne Lane
<b>City:</b>	Indianapolis, Indiana 46218
<b>Phone #:</b>	(317) 547-9511
<b>SSOA #:</b>	S097-23241-00590

<b>Certification by the Authorized Individual</b>
I hereby certify that Irvin-Rogers Brick & Block, LLC is still in operation and is in compliance with the requirements of the Source Specific Operating Agreement (SSOA) <b>S097-23241-00590</b> .
<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>