INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Source Modification and
Part 70 Operating Permit

for Brickcraft, LLC in Clay County

Significant Source Modification No. 021-30024-00054
Part 70 Operating Permit No. T021-23323-00054

The Indiana Department of Environmental Management (IDEM) has received an application from Brickcraft, LLC located at 200 North SR 59, Center Point, Indiana to transition from their MSOP issued on March 1, 2004 to a Part 70 Operation Permit. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Brickcraft, LLC to make certain changes at their existing source. Brickcraft, LLC has applied to operate a stationary brick manufacturing plant; Brickcraft, LLC has also applied to construct and operate two outdoor storage silos.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. The potential to emit criteria pollutants will continue to be limited to less than the PSD major source threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents that would allow the applicant to make this change.

IDEM is aware that the lime and sodium bicarbonate storage silos have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft Part 70 Operation Permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Clay County Genealogy Library
309 East Main Street
Center Point, IN 47840

and

Brazil Public Library
204 North Walnut Street
Brazil, IN 47834

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T021-23323-00054 in all correspondence.

Comments should be sent to:

John Haney
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5328
Or dial directly: (317) 234-5328
E-mail: jhaney@idem.in.gov

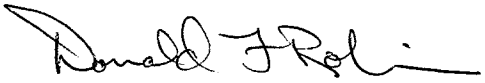
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local libraries indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact John Haney of my staff at the above address.



Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

DFR/jeh

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Part 70 Operating Permit
OFFICE OF AIR QUALITY

Brickcraft, LLC
200 North SR 59
Center Point, Indiana 47840

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T021-23323-00054	
Issued by: Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary brick manufacturing plant.

Source Address:	200 North SR 59, Center Point, Indiana 47840
General Source Phone Number:	(812) 835-2502
SIC Code:	3251
County Location:	Clay
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, under Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) quarry, constructed in 2004, with a capacity of 125 tons of shale per hour;

(b) One (1) outdoor aggregate storage pile, with a capacity of 125 tons of shale per hour.

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(e) One (1) outdoor spent injection material storage pile, with a capacity of 185 pounds of lime/sodium bicarbonate mixture per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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) British thermal units per hour:

Three (3) torpedo heaters, with no unit identification, each with a heat input capacity of 1.70 MMBtu per hour.

(b) Combustion source flame safety purging on start-up.

(c) Petroleum fuel (other than gasoline) dispensing facilities, having storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month:

(1) One (1) storage tank, constructed in 2004, identified as Main, for storage of diesel fuel, with a maximum volume of 1,000 gallons; and

(2) One (1) storage tank, constructed in 2004, identified as Quarry, for storage of diesel fuel, with a maximum volume of 2,000 gallons.

(d) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Refractory storage not requiring air pollution control equipment.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(g) Paved and unpaved roads. [326 IAC 6-4] [326 IAC 6-5]

(h) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(i) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T021-23323-00054, 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, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

(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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T021-23323-00054 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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 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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-7-20(b),(c), or (e). 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 in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 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 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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) Except as provided in 326 IAC 2-7-19(e), 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 2-7-5(3)] [326 IAC 2-7-6] [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 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Opacity [326 IAC 5-1]

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

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

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

C.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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Licensed 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 Licensed Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5] [326 IAC 2-7-6]

C.12 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than ninety (90) days after the date of issuance of this permit.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, 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 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]

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C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

(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; and/or

(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 record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-7-5(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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by

326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.19 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Fugitive Emissions

(a) One (1) quarry, constructed in 2004, with a capacity of 125 tons of shale per hour;

(b) One (1) outdoor aggregate storage pile, with a capacity of 125 tons of shale per hour.

(e) One (1) outdoor spent injection material storage pile, with a capacity of 185 pounds of lime/sodium bicarbonate mixture per hour.

Insignificant Activities

(g) Paved and unpaved roads. [326 IAC 6-4] [326 IAC 6-5]

(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 2-7-5(1)]

D.1.1 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 included as Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Aggregate Processing

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control,

exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from emission units shall not exceed allowable particulate emissions when operating at a maximum process weight rate as specified in the table below.

The pounds per hour limitations were calculated using the following equation:

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

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

The allowable emissions for each facility operating at its maximum process weight rate are as follows:

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Grinding and Scalping Screen Operation	125	53.55
Finishing Screen Operation	70	47.77
Pugmill	60	46.29

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these units and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Brick Manufacturing

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(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 2-7-5(1)]

D.3.1 PSD Minor Limits [326 IAC 2-2]

(a) The PM emissions from the lime silo and sodium bicarbonate silo shall not exceed 5.0 pounds per hour, each.

(b) The PM_{10} emissions from the lime silo and sodium bicarbonate silo shall not exceed 17.6 pounds per hour, each.

(c) The SO_2 emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The dry injection fabric filter (DIFF) for PM and PM_{10} control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(e) The dry injection fabric filter (DIFF) for SO_2 control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the limits in Condition D.3.1, combined with the unrestricted potential to emit from other units at the source, will limit the source-wide potential to emit PM, PM_{10}, and SO_2 to less than 250 tons per twelve (12) consecutive month period, each. Compliance with these limits renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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D.3.2 HAP Minor Limits [326 IAC 2-4.1]

(a) The HF emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln shall not exceed 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The dry injection fabric filter (DIFF) for HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the limits in Condition D.3.2, combined with the potential to emit from other units at the source, will limit the source-wide potential to emit HF to less than 10 tons per twelve (12) consecutive month period. Compliance with these limits renders 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from emission units shall not exceed allowable particulate emissions when operating at a maximum process weight rate as specified in the table below.

The pounds per hour limitations were calculated using the following equation:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

The allowable emissions for each facility operating at its maximum process weight rate are as follows:

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Brick Dryer	9.05	17.9
Tunnel Kiln	9.05	17.9
Lime Storage Silo - Receiving	25	35.4
Bicarbonate Storage Silo - Receiving	25	35.4

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these units and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.5 Emissions Control [326 IAC 2-7-6(6)]

(a) In order to comply with Conditions D.3.1(a) and D.3.1(b), the dry injection fabric filter (DIFF) for particulate control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(b) When determining compliance with Conditions D.3.1(c) and D.3.2(a) without the use of a CEMS, the dry injection fabric filter (DIFF) for SO_2 and HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.3.1(c) without the use of a CEMS, the Permittee shall perform SO_2 testing of the dry injection fabric filter (DIFF) controlling the tunnel kiln utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Condition D.3.2(a) without the use of a CEMS, the Permittee shall perform HF testing of the dry injection fabric filter (DIFF) controlling the tunnel kiln utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.3.7 Sulfur Dioxide (SO_2)

In order to determine compliance with the SO_2 emissions limit in Condition D.3.1(c), the SO_2 emissions from the tunnel kiln shall be calculated using the following formula:

$$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON\text{-}DIFF} \times H_{NON\text{-}DIFF} / 2000)]$$

where:

E_{TOTAL}	= combined total tons of SO_2 emissions per month
E_{CEMS}	= total tons of SO_2 emissions per month from the tunnel kiln, as determined with the CEMS output
C	= capacity of the tunnel kiln, which equals 10 tons/hr
EF_{DIFF}	= SO_2 emission factor from the tunnel kiln when controlled by the DIFF, which equals 5.41 lb/ton or the most recent valid compliance demonstration
H_{DIFF}	= total number of hours per month the tunnel kiln was controlled by the DIFF
2000	= lb/ton
$EF_{NON\text{-}DIFF}$	= SO_2 emission factor from the tunnel kiln when controlled by the DIFF, which equals 25.0 lb/ton or the most recent valid compliance demonstration
$H_{NON\text{-}DIFF}$	= total number of hours per month the tunnel kiln bypassed the DIFF

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D.3.8 Hydrogen Fluoride/Hydrofluoric Acid (HF)

In order to determine compliance with the HF emissions limit in Condition D.3.2(a), the HF emissions from the tunnel kiln shall be calculated using the following formula:

$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON\text{-}DIFF} \times H_{NON\text{-}DIFF} / 2000)]$

where:

E_{TOTAL}	= combined total tons of HF emissions per month
E_{CEMS}	= total tons of HF emissions per month from the tunnel kiln, as determined with the CEMS output
C	= capacity of the tunnel kiln, which equals 10 tons/hr
EF_{DIFF}	= HF emission factor from the tunnel kiln when controlled by the DIFF, which equals 0.22 lb/ton or the most recent valid compliance demonstration
H_{DIFF}	= total number of hours per month the tunnel kiln was controlled by the DIFF
2000	= lb/ton
$EF_{NON\text{-}DIFF}$	= HF emission factor from the tunnel kiln when controlled by the DIFF, which equals 0.37 lb/ton or the most recent valid compliance demonstration
$H_{NON\text{-}DIFF}$	= total number of hours per month the tunnel kiln bypassed the DIFF

D.3.9 Sulfur Content

In order to determine compliance with Condition D.3.1(c) when determining compliance without the use of a CEMS, the Permittee shall demonstrate that the sulfur dioxide emissions from the tunnel kiln does not exceed 25.00 pounds per ton of fired product. Compliance shall be determined utilizing one of the following options:

(a) Sampling and analyzing the aggregate feedstock by using the following procedures:

(1) The aggregate sample acquisition point shall be at a location where representative samples of the feedstock to be consumed by the facility may be obtained;

(2) The aggregate shall be sampled at least one (1) time per day;

(3) Minimum sample size shall be five hundred (500) grams;

(4) Samples shall be composited and analyzed at the end of each calendar quarter;

(5) Sulfur content analysis shall be determined by an independent laboratory; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the tunnel kiln, using 40 CFR 60, Appendix A, Method 6, which is conducted with such frequency as to generate the amount of information required by (a) above.

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.3.10 Continuous Emission Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)(A)(iii)] [40 CFR 64]

(a) In order to determine compliance with Conditions D.3.1(c) and D.3.2(a) when determining compliance with the use of a CEMS, the Permittee shall maintain, calibrate, and operate a continuous emission monitoring system (CEMS) and related equipment for measuring SO_2 and HF emissions from the tunnel kiln in accordance with 326 IAC 3-5.

(b) The SO_2 and HF CEMS shall be operated at all times the tunnel kiln is in operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.

(c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a CEMS pursuant to 326 IAC 3-5.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.3.11 SO_2 and HF Monitor Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(1)]

When determining compliance with Conditions D.3.1(c) and D.3.2(a) with the use of a CEMS, whenever the CEMS is down for more than twenty-four (24) hours, a calibrated backup CEMS shall be brought online within twenty-four (24) hours of shutdown of the primary CEMS, if possible. If this is not possible, the requirements in Condition D.3.14(b) shall be conducted to allow for determination of compliance with the SO_2 and HF emission limits.

D.3.12 Visible Emissions Notations

(a) Visible emission notations of the dry injection fabric filter (DIFF) exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.13 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the dry injection fabric filter (DIFF) at least once per day when any of the tunnel kiln, lime silo, and sodium bicarbonate silo are in operation. When for any one reading, the pressure drop across the DIFF is outside the normal range of 1 to 7 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer's specifications, if used.

D.3.14 SO_2 Compliance Assurance Monitoring [40 CFR 64]

Pursuant to 326 IAC 2 7 5(1), 326 IAC 2 7 6(1), and 40 CFR 64 (CAM):

(a) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS. When the CEMS is not operating, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that indicates the CEMS is not operating is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) When determining compliance without the use of a CEMS:

(1) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) continuously. When the dry lime feed rate is below 12% motor output speed (equivalent to 125 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(2) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) continuously. When the dry sodium bicarbonate feed rate is below 11% motor output speed (equivalent to 60 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(3) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day. If the lime feed quantity drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the limestone delivery systems (including the lime screw conveyor and holding bin) are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(4) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day. If the sodium bicarbonate feeder setting drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the sodium bicarbonate delivery systems, including the sodium

bicarbonate screw conveyor and holding bin, are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.3.15 HF Compliance Monitoring

(a) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS. When the CEMS is not operating, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that indicates the CEMS is not operating is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) When determining compliance without the use of a CEMS:

(1) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) once per day. When the dry lime feed rate is below 12% motor output speed (equivalent to 125 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(2) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) once per day. When the dry sodium bicarbonate feed rate is below 11% motor output speed (equivalent to 60 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(3) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day. If the lime feed quantity drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the limestone delivery systems (including the lime screw conveyor and holding bin) are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(4) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day. If the sodium bicarbonate feeder setting drops below the level established during the latest performance

test or runs out, the switches and/or level sensors monitoring the interlock system on the sodium bicarbonate delivery systems, including the sodium bicarbonate screw conveyor and holding bin, are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.3.16 Broken or Failed Bag Detection

In the event that failure of the dry injection fabric filter (DIFF) has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.17 Record Keeping Requirements

(a) To document the compliance status with Conditions D.3.1(e) and D.3.2(b), the Permittee shall maintain monthly records of the amount of time the dry injection fabric filter (DIFF) was bypassed.

(b) To document the compliance status with Conditions D.3.1 and D.3.9, the Permittee shall maintain records in accordance with (1) through (3) below:

(1) Calendar dates covered in the compliance determination period;

(2) Sulfur content of the aggregate feedstock; and

(3) Sulfur dioxide emission rates.

Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Condition D.3.1.

(c) To document the compliance status with Condition D.3.10, the Permittee shall maintain records of the SO_2 and HF CEMS output. Records shall be complete and sufficient to

establish compliance with the SO_2 and HF limits in Conditions D.3.1(f) and D.3.2(b) on a monthly basis.

(d) To document the compliance status with Condition D.3.11, the Permittee shall maintain the following information, recorded during periods of SO_2 and HF CEMS downtime:

(1) Calendar dates and beginning and ending times of CEMS downtime during the compliance determination period;

(2) Actual aggregate sulfur content, during CEMS downtime; and

(3) Documentation of the emission rate of SO_2 and HF, as determined in accordance with Conditions D.3.10 and D.3.11.

(e) To document the compliance status with Condition D.3.12, the Permittee shall maintain records of visible emission notations of the dry injection fabric filter (DIFF) exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(f) To document the compliance status with Conditions D.3.13, D.3.14, and D.3.15, the Permittee shall maintain records once per day of the pressure drop and feed quantity readings. The Permittee shall include in its daily record when a pressure drop reading or feed quantity reading is not taken and the reason for the lack of pressure drop reading or feed quantity reading (e.g., the process did not operate that day).

(g) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.3.18 Reporting Requirements

(a) A quarterly report of tons of SO_2 emissions to document the compliance status with Condition D.3.1(c) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A quarterly report of tons of HF emissions to document the compliance status with Condition D.3.2(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

(c) A quarterly report of hours of operation when bypassing the DIFF to document the compliance status with Conditions D.3.1(e) and D.3.2(b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Aggregate Processing

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

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(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the pre-kiln clay/shale/fireclay/sand processing operation (EU-02) except as otherwise specified in 40 CFR Part 60, Subpart OOO.

(b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 Standards of Performance for Nonmetallic Mineral Processing Plants [40 CFR Part 60, Subpart OOO]

The Permittee which engages in processing of nonmetallic mineral shall comply with the following provisions of 40 CFR Part 60, Subpart OOO, which are incorporated by reference as 326 IAC 12 (included as Attachment B of this permit):

(a) 40 CFR 60.670(a), (d), (e), (f);
(b) 40 CFR 60.671;
(c) 40 CFR 60.672(b), (d), (e)(1), (f);
(d) 40 CFR 60.673;
(e) 40 CFR 60.675(a), (c)(1)(i), (c)(1)(ii), (c)(2), (c)(3), (d)(2), (e), (g), (i);
(f) 40 CFR 60.676(a), (f), (h), (i)(1), (j), (k);
(g) Table 1 to 40 CFR 63, Subpart OOO; and
(h) Table 3 to 40 CFR 63, Subpart OOO.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054

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:
Phone:
Date:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054

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

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

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, 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
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: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054
Facility: Dry injection fabric filter (DIFF)
Parameter: SO_2 emissions
Limit: Not to exceed 249 tons per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054
Facility: Dry injection fabric filter (DIFF)
Parameter: HF emissions
Limit: Not to exceed 10 tons per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054
Facility: Dry injection fabric filter (DIFF)
Parameter: Number of hours the DIFF may be bypassed (for routine maintenance)
Limit: Maximum of 125 hours per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Brickcraft, LLC
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-23323-00054

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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 "No 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:	

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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: _____

ATTACHMENT A

FUGITIVE DUST CONTROL PLAN

BRICKCRAFT
200 NORTH SR 59
CENTER POINT, IN 47840

(a) Fugitive particulate matter (dust) emissions from unpaved roads and gravel areas shall be controlled by one or more of the following measures:

(1) Unpaved roads and gravel areas:

(A) Application of water on an as needed basis

(b) Fugitive particulate matter (dust) emissions from aggregate stockpiles shall be controlled by one or more of the following measures:

(1) Maintain minimum size and number of stock piles of aggregate.
(2) Treating around the stockpile area with water on an as needed basis.
(3) Treating the stockpiles with water on an as needed basis.

(c) Fugitive particulate matter (dust) emissions from outdoor conveying of aggregates shall be controlled by one or more of the following measures:

(1) Apply water at the feed and the intermediate points on an as needed basis.

(d) Fugitive particulate matter (dust) emissions from the transferring of aggregates shall be controlled by one or more of the following measures:

(1) Minimize the vehicular distance between the transfer points.
(2) Enclose the transfer points.
(3) Apply water on transfer points on an as needed basis.

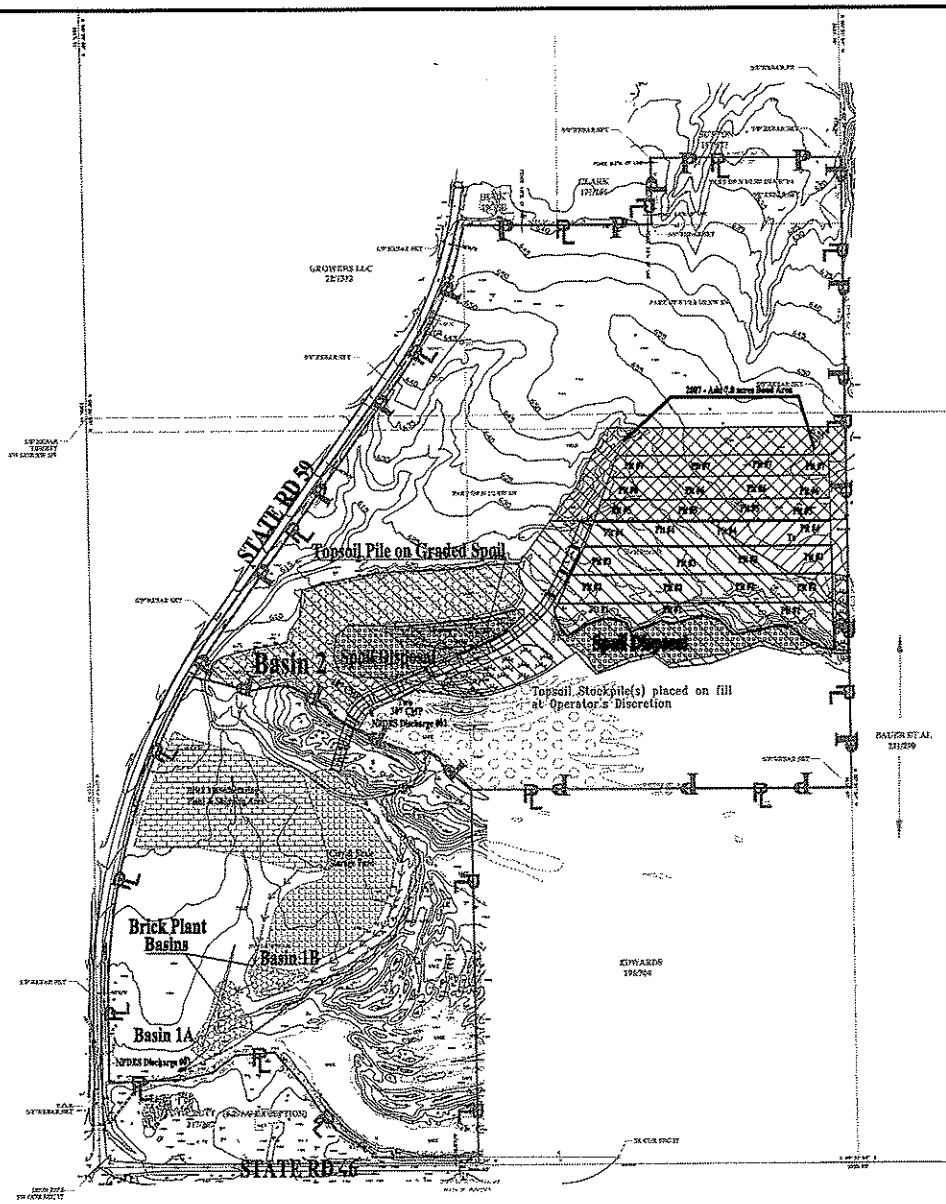
(e) Fugitive particulate matter (dust) emissions from transporting of aggregate by truck, front end loader, etc. shall be controlled by one or more of the following measures:

(1) Tarping the aggregate hauling vehicles.
(2) Maintain vehicle bodies in a condition to prevent leakage.
(3) Spray the aggregates with water.
(4) Maintain a 10 mile per hour (MPH) speed limit in the yard.

(f) Fugitive particulate matter (dust) emissions from the loading and unloading of aggregate shall be controlled by one or more of the following measures:

(1) Reduce free fall distance to a minimum.
(2) Reduce the rate of discharge of the aggregate.
(3) Spray the aggregate with water on an as needed basis.

"An as needed basis" means the frequency or quantity of application necessary to minimize visible particulate matter emissions.



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BrickCraft, LLC
P. O. Box 104 Clay City, IN 47841

BrickCraft Clay Mine

Clay Mine Permit Boundary

BrickCraft, LLC Property Boundary

From: BrickCraft, LLC 2003 Topographic Map Contour Interval = 5 feet

SCALE: 0 ft. 200 ft. 400 ft. 600 ft. 800 ft. 1000 ft.

Operations Location Map 2007 Renewal

Mine Facilities Legend

- Sediment Basins (Basin 2)
- Diversion Ditches
- Spoil Disposal Area
- Existing Structures
- Haulroad
- Topsoil Stockpile
- Existing Water Pond
- Bonded Area
  Rev. Aug. 2007
  Add 7.0 acres Bond
  New Total = 28.8 acres Bond

Brick Plant Facilities Legend

- Sediment Basins (Basins 1A & 1B)
- Diversion Ditches
- Clay & Shale Storage Yard
- Brick Manufacturing Plant & Shipping Area

Standard NPDES Discharge Permit - IN 0061981

Rev. 08/21/07, Update & Add Bond

Signed: _____

Registration No.: _____

Date: _____

Prepared By:
Land Management Associates, Inc.
P.O. Box 98
Wadesville, IN 47638
Voice (812) 874-1202
FAX (812) 874-1205

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Attachment B
to Part 70 Operating Permit No. T021-23323-00054

Brickcraft, LLC
200 North SR 59, Center Point, IN 47840

Title 40: Protection of Environment
Subpart OOO—Standards of Performance for Nonmetallic Mineral Processing Plants

Source: 74 FR 19309, Apr. 28, 2009, unless otherwise noted.

§ 60.670 Applicability and designation of affected facility.

(a)(1) Except as provided in paragraphs (a)(2), (b), (c), and (d) of this section, the provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart.

(2) The provisions of this subpart do not apply to the following operations: All facilities located in underground mines; plants without crushers or grinding mills above ground; and wet material processing operations (as defined in §60.671).

(b) An affected facility that is subject to the provisions of subparts F or I of this part or that follows in the plant process any facility subject to the provisions of subparts F or I of this part is not subject to the provisions of this subpart.

(c) Facilities at the following plants are not subject to the provisions of this subpart:

(1) Fixed sand and gravel plants and crushed stone plants with capacities, as defined in §60.671, of 23 megagrams per hour (25 tons per hour) or less;

(2) Portable sand and gravel plants and crushed stone plants with capacities, as defined in §60.671, of 136 megagrams per hour (150 tons per hour) or less; and

(3) Common clay plants and pumice plants with capacities, as defined in §60.671, of 9 megagrams per hour (10 tons per hour) or less.

(d)(1) When an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in §60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of §§60.672, 60.674, and 60.675 except as provided for in paragraph (d)(3) of this section.

(2) An owner or operator complying with paragraph (d)(1) of this section shall submit the information required in §60.676(a).

(3) An owner or operator replacing all existing facilities in a production line with new facilities does not qualify for the exemption described in paragraph (d)(1) of this section and must comply with the provisions of §§60.672, 60.674 and 60.675.

(e) An affected facility under paragraph (a) of this section that commences construction, modification, or reconstruction after August 31, 1983, is subject to the requirements of this part.

(f) Table 1 of this subpart specifies the provisions of subpart A of this part 60 that do not apply to owners and operators of affected facilities subject to this subpart or that apply with certain exceptions.

§ 60.671 Definitions.

All terms used in this subpart, but not specifically defined in this section, shall have the meaning given them in the Act and in subpart A of this part.

Bagging operation means the mechanical process by which bags are filled with nonmetallic minerals.

Belt conveyor means a conveying device that transports material from one location to another by means of an endless belt that is carried on a series of idlers and routed around a pulley at each end.

Bucket elevator means a conveying device of nonmetallic minerals consisting of a head and foot assembly which supports and drives an endless single or double strand chain or belt to which buckets are attached.

Building means any frame structure with a roof.

Capacity means the cumulative rated capacity of all initial crushers that are part of the plant.

Capture system means the equipment (including enclosures, hoods, ducts, fans, dampers, etc.) used to capture and transport particulate matter generated by one or more affected facilities to a control device.

Control device means the air pollution control equipment used to reduce particulate matter emissions released to the atmosphere from one or more affected facilities at a nonmetallic mineral processing plant.

Conveying system means a device for transporting materials from one piece of equipment or location to another location within a plant. Conveying systems include but are not limited to the following: Feeders, belt conveyors, bucket elevators and pneumatic systems.

Crush or *Crushing* means to reduce the size of nonmetallic mineral material by means of physical impaction of the crusher or grinding mill upon the material.

Crusher means a machine used to crush any nonmetallic minerals, and includes, but is not limited to, the following types: Jaw, gyratory, cone, roll, rod mill, hammermill, and impactor.

Enclosed truck or railcar loading station means that portion of a nonmetallic mineral processing plant where nonmetallic minerals are loaded by an enclosed conveying system into enclosed trucks or railcars.

Fixed plant means any nonmetallic mineral processing plant at which the processing equipment specified in §60.670(a) is attached by a cable, chain, turnbuckle, bolt or other means (except electrical connections) to any anchor, slab, or structure including bedrock.

Fugitive emission means particulate matter that is not collected by a capture system and is released to the atmosphere at the point of generation.

Grinding mill means a machine used for the wet or dry fine crushing of any nonmetallic mineral. Grinding mills include, but are not limited to, the following types: Hammer, roller, rod, pebble and ball, and fluid energy. The grinding mill includes the air conveying system, air separator, or air classifier, where such systems are used.

Initial crusher means any crusher into which nonmetallic minerals can be fed without prior crushing in the plant.

Nonmetallic mineral means any of the following minerals or any mixture of which the majority is any of the following minerals:

(1) Crushed and Broken Stone, including Limestone, Dolomite, Granite, Traprock, Sandstone, Quartz, Quartzite, Marl, Marble, Slate, Shale, Oil Shale, and Shell.

(2) Sand and Gravel.

(3) Clay including Kaolin, Fireclay, Bentonite, Fuller's Earth, Ball Clay, and Common Clay.

(4) Rock Salt.

(5) Gypsum (natural or synthetic).

(6) Sodium Compounds, including Sodium Carbonate, Sodium Chloride, and Sodium Sulfate.

(7) Pumice.

(8) Gilsonite.

(9) Talc and Pyrophyllite.

(10) Boron, including Borax, Kernite, and Colemanite.

(11) Barite.

(12) Fluorospar.

(13) Feldspar.

(14) Diatomite.

(15) Perlite.

(16) Vermiculite.

(17) Mica.

(18) Kyanite, including Andalusite, Sillimanite, Topaz, and Dumortierite.

Nonmetallic mineral processing plant means any combination of equipment that is used to crush or grind any nonmetallic mineral wherever located, including lime plants, power plants, steel mills, asphalt concrete plants, portland cement plants, or any other facility processing nonmetallic minerals except as provided in §60.670 (b) and (c).

Portable plant means any nonmetallic mineral processing plant that is mounted on any chassis or skids and may be moved by the application of a lifting or pulling force. In addition, there shall be no cable, chain, turnbuckle, bolt or other means (except electrical connections) by which any piece of equipment is attached or clamped to any anchor, slab, or structure, including bedrock that must be removed prior to the application of a lifting or pulling force for the purpose of transporting the unit.

Production line means all affected facilities (crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins, and enclosed truck and railcar loading stations) which are directly connected or are connected together by a conveying system.

Saturated material means, for purposes of this subpart, mineral material with sufficient surface moisture such that particulate matter emissions are not generated from processing of the material through screening operations, bucket elevators and belt conveyors. Material that is wetted solely by wet suppression systems is not considered to be “saturated” for purposes of this definition.

Screening operation means a device for separating material according to size by passing undersize material through one or more mesh surfaces (screens) in series, and retaining oversize material on the mesh surfaces (screens). Grizzly feeders associated with truck dumping and static (non-moving) grizzlies used anywhere in the nonmetallic mineral processing plant are not considered to be screening operations.

Seasonal shut down means shut down of an affected facility for a period of at least 45 consecutive days due to weather or seasonal market conditions.

Size means the rated capacity in tons per hour of a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station; the total surface area of the top screen of a screening operation; the width of a conveyor belt; and the rated capacity in tons of a storage bin.

Stack emission means the particulate matter that is released to the atmosphere from a capture system.

Storage bin means a facility for storage (including surge bins) of nonmetallic minerals prior to further processing or loading.

Transfer point means a point in a conveying operation where the nonmetallic mineral is transferred to or from a belt conveyor except where the nonmetallic mineral is being transferred to a stockpile.

Truck dumping means the unloading of nonmetallic minerals from movable vehicles designed to transport nonmetallic minerals from one location to another. Movable vehicles include but are not limited to: Trucks, front end loaders, skip hoists, and railcars.

Vent means an opening through which there is mechanically induced air flow for the purpose of exhausting from a building air carrying particulate matter emissions from one or more affected facilities.

Wet material processing operation(s) means any of the following:

(1) Wet screening operations (as defined in this section) and subsequent screening operations, bucket elevators and belt conveyors in the production line that process saturated materials (as defined in this section) up to the first crusher, grinding mill or storage bin in the production line; or

(2) Screening operations, bucket elevators and belt conveyors in the production line downstream of wet mining operations (as defined in this section) that process saturated materials (as defined in this section) up to the first crusher, grinding mill or storage bin in the production line.

Wet mining operation means a mining or dredging operation designed and operated to extract any nonmetallic mineral regulated under this subpart from deposits existing at or below the water table, where the nonmetallic mineral is saturated with water.

Wet screening operation means a screening operation at a nonmetallic mineral processing plant which removes unwanted material or which separates marketable fines from the product by a washing process which is designed and operated at all times such that the product is saturated with water.

§ 60.672 Standard for particulate matter (PM).

(a) Affected facilities must meet the stack emission limits and compliance requirements in Table 2 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.8. The requirements in Table 2 of this subpart apply for affected facilities with capture systems used to capture and transport particulate matter to a control device.

(b) Affected facilities must meet the fugitive emission limits and compliance requirements in Table 3 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11. The requirements in Table 3 of this subpart apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems.

(c) [Reserved]

(d) Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is exempt from the requirements of this section.

(e) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in paragraphs (a) and (b) of this section, or the building enclosing the affected facility or facilities must comply with the following emission limits:

(1) Fugitive emissions from the building openings (except for vents as defined in §60.671) must not exceed 7 percent opacity; and

(2) Vents (as defined in §60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of this subpart.

(f) Any baghouse that controls emissions from only an individual, enclosed storage bin is exempt from the applicable stack PM concentration limit (and associated performance testing) in Table 2 of this subpart but must meet the applicable stack opacity limit and compliance requirements in Table 2 of this subpart. This exemption from the stack PM concentration limit does not apply for multiple storage bins with combined stack emissions.

§ 60.673 Reconstruction.

(a) The cost of replacement of ore-contact surfaces on processing equipment shall not be considered in calculating either the “fixed capital cost of the new components” or the “fixed capital cost that would be required to construct a

comparable new facility" under §60.15. Ore-contact surfaces are crushing surfaces; screen meshes, bars, and plates; conveyor belts; and elevator buckets.

(b) Under §60.15, the "fixed capital cost of the new components" includes the fixed capital cost of all depreciable components (except components specified in paragraph (a) of this section) which are or will be replaced pursuant to all continuous programs of component replacement commenced within any 2-year period following August 31, 1983.

§ 60.674 Monitoring of operations.

(a) The owner or operator of any affected facility subject to the provisions of this subpart which uses a wet scrubber to control emissions shall install, calibrate, maintain and operate the following monitoring devices:

(1) A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ±250 pascals ±1 inch water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions.

(2) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within ±5 percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions.

(b) The owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses wet suppression to control emissions from the affected facility must perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. The owner or operator must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the owner or operator finds that water is not flowing properly during an inspection of the water spray nozzles. The owner or operator must record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under §60.676(b).

(1) If an affected facility relies on water carryover from upstream water sprays to control fugitive emissions, then that affected facility is exempt from the 5-year repeat testing requirement specified in Table 3 of this subpart provided that the affected facility meets the criteria in paragraphs (b)(1)(i) and (ii) of this section:

(i) The owner or operator of the affected facility conducts periodic inspections of the upstream water spray(s) that are responsible for controlling fugitive emissions from the affected facility. These inspections are conducted according to paragraph (b) of this section and §60.676(b), and

(ii) The owner or operator of the affected facility designates which upstream water spray(s) will be periodically inspected at the time of the initial performance test required under §60.11 of this part and §60.675 of this subpart.

(2) If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under §60.676(b) must specify the control mechanism being used instead of the water sprays.

(c) Except as specified in paragraph (d) or (e) of this section, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions must conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR part 60, Appendix A–7). The Method 22 (40 CFR part 60, Appendix A–7) test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator of the affected facility must initiate corrective action within 24 hours to return the baghouse to normal operation. The owner or operator must record each Method 22 (40 CFR part 60, Appendix A–7) test, including the date and any corrective actions taken, in the logbook required under §60.676(b). The owner or operator of the affected facility may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) simultaneously with a Method 22 (40 CFR part 60, Appendix A–7) to determine what constitutes normal visible emissions from that affected facility's baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of this subpart. The revised visible emissions success level must be incorporated into the permit for the affected facility.

(d) As an alternative to the periodic Method 22 (40 CFR part 60, Appendix A–7) visible emissions inspections specified in paragraph (c) of this section, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may

use a bag leak detection system. The owner or operator must install, operate, and maintain the bag leak detection system according to paragraphs (d)(1) through (3) of this section.

(1) Each bag leak detection system must meet the specifications and requirements in paragraphs (d)(1)(i) through (viii) of this section.

(i) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per dry standard cubic meter (0.00044 grains per actual cubic foot) or less.

(ii) The bag leak detection system sensor must provide output of relative PM loadings. The owner or operator shall continuously record the output from the bag leak detection system using electronic or other means (*e.g.* , using a strip chart recorder or a data logger).

(iii) The bag leak detection system must be equipped with an alarm system that will sound when the system detects an increase in relative particulate loading over the alarm set point established according to paragraph (d)(1)(iv) of this section, and the alarm must be located such that it can be heard by the appropriate plant personnel.

(iv) In the initial adjustment of the bag leak detection system, the owner or operator must establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.

(v) Following initial adjustment, the owner or operator shall not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority except as provided in paragraph (d)(1)(vi) of this section.

(vi) Once per quarter, the owner or operator may adjust the sensitivity of the bag leak detection system to account for seasonal effects, including temperature and humidity, according to the procedures identified in the site-specific monitoring plan required by paragraph (d)(2) of this section.

(vii) The owner or operator must install the bag leak detection sensor downstream of the fabric filter.

(viii) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(2) The owner or operator of the affected facility must develop and submit to the Administrator or delegated authority for approval of a site-specific monitoring plan for each bag leak detection system. The owner or operator must operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times. Each monitoring plan must describe the items in paragraphs (d)(2)(i) through (vi) of this section.

(i) Installation of the bag leak detection system;

(ii) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established;

(iii) Operation of the bag leak detection system, including quality assurance procedures;

(iv) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;

(v) How the bag leak detection system output will be recorded and stored; and

(vi) Corrective action procedures as specified in paragraph (d)(3) of this section. In approving the site-specific monitoring plan, the Administrator or delegated authority may allow owners and operators more than 3 hours to alleviate a specific condition that causes an alarm if the owner or operator identifies in the monitoring plan this specific condition as one that could lead to an alarm, adequately explains why it is not feasible to alleviate this condition within 3 hours of the time the alarm occurs, and demonstrates that the requested time will ensure alleviation of this condition as expeditiously as practicable.

(3) For each bag leak detection system, the owner or operator must initiate procedures to determine the cause of every alarm within 1 hour of the alarm. Except as provided in paragraph (d)(2)(vi) of this section, the owner or operator must alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to the following:

(i) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;

(ii) Sealing off defective bags or filter media;

(iii) Replacing defective bags or filter media or otherwise repairing the control device;

(iv) Sealing off a defective fabric filter compartment;

(v) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; or

(vi) Shutting down the process producing the PM emissions.

(e) As an alternative to the periodic Method 22 (40 CFR part 60, Appendix A–7) visible emissions inspections specified in paragraph (c) of this section, the owner or operator of any affected facility that is subject to the requirements for processed stone handling operations in the Lime Manufacturing NESHAP (40 CFR part 63, subpart AAAAA) may follow the continuous compliance requirements in row 1 items (i) through (iii) of Table 6 to Subpart AAAAA of 40 CFR part 63.

§ 60.675 Test methods and procedures.

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendices A–1 through A–7 of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (e) of this section.

(b) The owner or operator shall determine compliance with the PM standards in §60.672(a) as follows:

(1) Except as specified in paragraphs (e)(3) and (4) of this section, Method 5 of Appendix A–3 of this part or Method 17 of Appendix A–6 of this part shall be used to determine the particulate matter concentration. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5 (40 CFR part 60, Appendix A–3), if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter.

(2) Method 9 of Appendix A–4 of this part and the procedures in §60.11 shall be used to determine opacity.

(c)(1) In determining compliance with the particulate matter standards in §60.672(b) or §60.672(e)(1), the owner or operator shall use Method 9 of Appendix A–4 of this part and the procedures in §60.11, with the following additions:

(i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).

(ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (*e.g.,* road dust). The required observer position relative to the sun (Method 9 of Appendix A–4 of this part, Section 2.1) must be followed.

(iii) For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.

(2)(i) In determining compliance with the opacity of stack emissions from any baghouse that controls emissions only from an individual enclosed storage bin under §60.672(f) of this subpart, using Method 9 (40 CFR part 60, Appendix A–4), the duration of the Method 9 (40 CFR part 60, Appendix A–4) observations shall be 1 hour (ten 6-minute averages).

(ii) The duration of the Method 9 (40 CFR part 60, Appendix A–4) observations may be reduced to the duration the affected facility operates (but not less than 30 minutes) for baghouses that control storage bins or enclosed truck or railcar loading stations that operate for less than 1 hour at a time.

(3) When determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of this subpart, the duration of the Method 9 (40 CFR part 60, Appendix A–4)

observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Table 3 of this subpart must be based on the average of the five 6-minute averages.

(d) To demonstrate compliance with the fugitive emission limits for buildings specified in §60.672(e)(1), the owner or operator must complete the testing specified in paragraph (d)(1) and (2) of this section. Performance tests must be conducted while all affected facilities inside the building are operating.

(1) If the building encloses any affected facility that commences construction, modification, or reconstruction on or after April 22, 2008, the owner or operator of the affected facility must conduct an initial Method 9 (40 CFR part 60, Appendix A–4) performance test according to this section and §60.11.

(2) If the building encloses only affected facilities that commenced construction, modification, or reconstruction before April 22, 2008, and the owner or operator has previously conducted an initial Method 22 (40 CFR part 60, Appendix A–7) performance test showing zero visible emissions, then the owner or operator has demonstrated compliance with the opacity limit in §60.672(e)(1). If the owner or operator has not conducted an initial performance test for the building before April 22, 2008, then the owner or operator must conduct an initial Method 9 (40 CFR part 60, Appendix A–4) performance test according to this section and §60.11 to show compliance with the opacity limit in §60.672(e)(1).

(e) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For the method and procedure of paragraph (c) of this section, if emissions from two or more facilities continuously interfere so that the opacity of fugitive emissions from an individual affected facility cannot be read, either of the following procedures may be used:

(i) Use for the combined emission stream the highest fugitive opacity standard applicable to any of the individual affected facilities contributing to the emissions stream.

(ii) Separate the emissions so that the opacity of emissions from each affected facility can be read.

(2) A single visible emission observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions are met:

(i) No more than three emission points may be read concurrently.

(ii) All three emission points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

(iii) If an opacity reading for any one of the three emission points equals or exceeds the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point.

(3) Method 5I of Appendix A–3 of this part may be used to determine the PM concentration as an alternative to the methods specified in paragraph (b)(1) of this section. Method 5I (40 CFR part 60, Appendix A–3) may be useful for affected facilities that operate for less than 1 hour at a time such as (but not limited to) storage bins or enclosed truck or railcar loading stations.

(4) In some cases, velocities of exhaust gases from building vents may be too low to measure accurately with the type S pitot tube specified in EPA Method 2 of Appendix A–1 of this part [*i.e.,* velocity head <1.3 mm H_2O (0.05 in. H_2O)] and referred to in EPA Method 5 of Appendix A–3 of this part. For these conditions, the owner or operator may determine the average gas flow rate produced by the power fans (*e.g.,* from vendor-supplied fan curves) to the building vent. The owner or operator may calculate the average gas velocity at the building vent measurement site using Equation 1 of this section and use this average velocity in determining and maintaining isokinetic sampling rates.

$$v_e = \frac{Q_f}{A_e} \qquad (\text{Eq. 1})$$

Where:
V_e= average building vent velocity (feet per minute);
Q_f= average fan flow rate (cubic feet per minute); and
A_e= area of building vent and measurement location (square feet).

(f) To comply with §60.676(d), the owner or operator shall record the measurements as required in §60.676(c) using the monitoring devices in §60.674 (a)(1) and (2) during each particulate matter run and shall determine the averages.

(g) For performance tests involving only Method 9 (40 CFR part 60 Appendix A–4) testing, the owner or operator may reduce the 30-day advance notification of performance test in §60.7(a)(6) and 60.8(d) to a 7-day advance notification.

(h) [Reserved]

(i) If the initial performance test date for an affected facility falls during a seasonal shut down (as defined in §60.671 of this subpart) of the affected facility, then with approval from the permitting authority, the owner or operator may postpone the initial performance test until no later than 60 calendar days after resuming operation of the affected facility.

§ 60.676 Reporting and recordkeeping.

(a) Each owner or operator seeking to comply with §60.670(d) shall submit to the Administrator the following information about the existing facility being replaced and the replacement piece of equipment.

(1) For a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:

(i) The rated capacity in megagrams or tons per hour of the existing facility being replaced and

(ii) The rated capacity in tons per hour of the replacement equipment.

(2) For a screening operation:

(i) The total surface area of the top screen of the existing screening operation being replaced and

(ii) The total surface area of the top screen of the replacement screening operation.

(3) For a conveyor belt:

(i) The width of the existing belt being replaced and

(ii) The width of the replacement conveyor belt.

(4) For a storage bin:

(i) The rated capacity in megagrams or tons of the existing storage bin being replaced and

(ii) The rated capacity in megagrams or tons of replacement storage bins.

(b)(1) Owners or operators of affected facilities (as defined in §§60.670 and 60.671) for which construction, modification, or reconstruction commenced on or after April 22, 2008, must record each periodic inspection required under §60.674(b) or (c), including dates and any corrective actions taken, in a logbook (in written or electronic format). The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Administrator upon request.

(2) For each bag leak detection system installed and operated according to §60.674(d), the owner or operator must keep the records specified in paragraphs (b)(2)(i) through (iii) of this section.

(i) Records of the bag leak detection system output;

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and

(iii) The date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and whether the cause of the alarm was alleviated within 3 hours of the alarm.

(3) The owner or operator of each affected facility demonstrating compliance according to §60.674(e) by following the requirements for processed stone handling operations in the Lime Manufacturing NESHAP (40 CFR part 63, subpart AAAAA) must maintain records of visible emissions observations required by §63.7132(a)(3) and (b) of 40 CFR part 63, subpart AAAAA.

(c) During the initial performance test of a wet scrubber, and daily thereafter, the owner or operator shall record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate.

(d) After the initial performance test of a wet scrubber, the owner or operator shall submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss and liquid flow rate decrease by more than 30 percent from the average determined during the most recent performance test.

(e) The reports required under paragraph (d) of this section shall be postmarked within 30 days following end of the second and fourth calendar quarters.

(f) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in §60.672 of this subpart, including reports of opacity observations made using Method 9 (40 CFR part 60, Appendix A–4) to demonstrate compliance with §60.672(b), (e) and (f).

(g) The owner or operator of any wet material processing operation that processes saturated and subsequently processes unsaturated materials, shall submit a report of this change within 30 days following such change. At the time of such change, this screening operation, bucket elevator, or belt conveyor becomes subject to the applicable opacity limit in §60.672(b) and the emission test requirements of §60.11.

(h) The subpart A requirement under §60.7(a)(1) for notification of the date construction or reconstruction commenced is waived for affected facilities under this subpart.

(i) A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator.

(1) For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

(2) For portable aggregate processing plants, the notification of the actual date of initial startup shall include both the home office and the current address or location of the portable plant.

(j) The requirements of this section remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected facilities within the State will be relieved of the obligation to comply with the reporting requirements of this section, provided that they comply with requirements established by the State.

(k) Notifications and reports required under this subpart and under subpart A of this part to demonstrate compliance with this subpart need only to be sent to the EPA Region or the State which has been delegated authority according to §60.4(b).

Table 1 to Subpart OOO—Exceptions to Applicability of Subpart A to Subpart OOO

Subpart A reference	Applies to subpart OOO	Explanation
60.4, Address	Yes	Except in §60.4(a) and (b) submittals need not be submitted to both the EPA Region and delegated State authority (§60.676(k)).
60.7, Notification and recordkeeping	Yes	Except in (a)(1) notification of the date construction or reconstruction commenced (§60.676(h)).
		Also, except in (a)(6) performance tests involving only Method 9 (40 CFR part 60, Appendix A–4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.8, Performance tests	Yes	Except in (d) performance tests involving only Method 9 (40 CFR part 60, Appendix A–4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.11, Compliance with standards and maintenance requirements	Yes	Except in (b) under certain conditions (§§60.675(c)), Method 9 (40 CFR part 60, Appendix A–4) observation is reduced from 3 hours to 30 minutes for fugitive emissions.
60.18, General control device	No	Flares will not be used to comply with the emission limits.

Table 2 to Subpart OOO—Stack Emission Limits for Affected Facilities With Capture Systems

For * * *	The owner or operator must meet a PM limit of * * *	And the owner or operator must meet an opacity limit of * * *	The owner or operator must demonstrate compliance with these limits by conducting * * *
Affected facilities (as defined in §§60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008	0.05 g/dscm (0.022 gr/dscf)[a]	7 percent for dry control devices[b]	An initial performance test according to §60.8 of this part and §60.675 of this subpart; and Monitoring of wet scrubber parameters according to §60.674(a) and §60.676(c), (d), and (e).
Affected facilities (as defined in §§60.670 and 60.671) that commence construction, modification, or reconstruction on or after April 22, 2008	0.032 g/dscm (0.014 gr/dscf)[a]	Not applicable (except for individual enclosed storage bins) 7 percent for dry control devices on individual enclosed storage bins	An initial performance test according to §60.8 of this part and §60.675 of this subpart; and Monitoring of wet scrubber parameters according to §60.674(a) and §60.676(c), (d), and (e); and
			Monitoring of baghouses according to §60.674(c), (d), or (e) and §60.676(b).

[a]Exceptions to the PM limit apply for individual enclosed storage bins and other equipment. See §60.672(d) through (f).
[b]The stack opacity limit and associated opacity testing requirements do not apply for affected facilities using wet scrubbers.

Table 3 to Subpart OOO—Fugitive Emission Limits

For * * *	The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility (as defined in §§60.670 and 60.671) * * *	The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used * * *	The owner or operator must demonstrate compliance with these limits by conducting * * *
Affected facilities (as defined in §§60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008	10 percent opacity	15 percent opacity	An initial performance test according to §60.11 of this part and §60.675 of this subpart.
Affected facilities (as defined in §§60.670 and 60.671) that commence construction, modification, or reconstruction on or after April 22, 2008	7 percent opacity	12 percent opacity	An initial performance test according to §60.11 of this part and §60.675 of this subpart; and Periodic inspections of water sprays according to §60.674(b) and §60.676(b); and
			A repeat performance test according to §60.11 of this part and §60.675 of this subpart within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in §60.674(b) and §60.676(b) are exempt from this 5-year repeat testing requirement.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification And Part 70 Operating Permit

Source Background and Description

Source Name:	Brickcraft, LLC
Source Location:	200 North SR 59, Center Point, Indiana 47840
County:	Clay
SIC Code:	3251
Significant Source Modification No.:	021-30024-00054
Part 70 Operating Permit No.:	T021-23323-00054
Permit Reviewer:	John Haney

The Office of Air Quality (OAQ) has reviewed the operating permit application from Brickcraft, LLC relating to the operation of a stationary brick manufacturing plant. On July 3, 2006, Brickcraft, LLC submitted an application to the OAQ requesting to transition from its MSOP to a Part 70 Operating Permit. Brickcraft, LLC was issued MSOP No. M021-18273-00054 on March 1, 2004.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) quarry, constructed in 2004, with a capacity of 125 tons of shale per hour;

(b) One (1) outdoor aggregate storage pile, with a capacity of 125 tons of shale per hour.

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(e) One (1) outdoor spent injection material storage pile, with a capacity of 185 pounds of lime/sodium bicarbonate mixture per hour.

Emission Units and Pollution Control Equipment Constructed and Operated without a Permit

The source consists of the following emission units that were constructed and are operating without a permit:

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

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) British thermal units per hour:

Three (3) torpedo heaters, with no unit identification, each with a heat input capacity of 1.70 MMBtu per hour.

(b) Combustion source flame safety purging on start-up.

(c) Petroleum fuel (other than gasoline) dispensing facilities, having storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month:

(1) One (1) storage tank, constructed in 2004, identified as Main, for storage of diesel fuel, with a maximum volume of 1,000 gallons; and

(2) One (1) storage tank, constructed in 2004, identified as Quarry, for storage of diesel fuel, with a maximum volume of 2,000 gallons.

(d) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Refractory storage not requiring air pollution control equipment.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(g) Paved and unpaved roads. [326 IAC 6-4] [326 IAC 6-5]

(h) A laboratory as defined in 326 IAC 2-7-1(21)(H).

(i) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

Existing Approvals

Since the issuance of the New Source Construction Permit and Minor Source Operating Permit (MSOP) No. M021-18273-00054 on March 1, 2004, the source has constructed or has been operating under the following additional approvals:

(a) First Notice Only Change No. 021-23685-00054, issued on October 24, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the section entitled “Emission Units and Pollution Control Equipment Constructed and Operated without a Permit”.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

(b) IDEM is aware that the kiln has not been in compliance with the following emission limitation:

(1) 326 IAC 2-2 (PSD)
Pursuant to Permit No. 021-18273-00054, Condition D.1.1, the sulfur dioxide (SO_2) emissions from the kiln shall be controlled to less than 249 tons per year in order to make 326 IAC 2-2 not applicable.

IDEM is reviewing this matter and will take appropriate action. This proposed permit will satisfy the requirements under 326 IAC 2-2.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
D-1	Dryer	44	4.0	45,000	105
CZ-1	Dryer	44	3.0	20,000	350
POC-1	Kiln	44	3.0	25,000	350
UCC-1	Kiln	44	2.0	10,000	300

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Clay County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for $PM_{2.5}$.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clay County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Clay County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions until 326 IAC 2-2 is revised. Because this source is accepting PM_{10} limits to be minor for PSD and because $PM_{2.5}$ is a subset of PM_{10}, PM_{10} is an adequate surrogate for $PM_{2.5}$.

(c) Other Criteria Pollutants
Clay County has been classified as attainment or unclassifiable in Indiana for all regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

Source Status

(a) On February 1, 2008, the source performed a stack test of the tunnel kiln. These results were reviewed and approved by IDEM on March 13, 2008. These results indicated SO_2 was emitted at a rate of 250 tons per year or more, and the source would have been a major stationary source, under PSD (326 IAC 2-2). The source has decided to limit its emissions below the major source thresholds. Therefore, this existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) Emissions based upon the Technical Support Document (TSD) for New Source Construction Permit and Minor Source Operating Permit (MSOP) No. M021-18273-00054 indicated HAP emissions were greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs, and the source would have been a major stationary source, under Section 112 of the Clean Air Act (CAA). The source has decided to limit its emissions below the major source thresholds. Therefore, this existing source is not a major stationary source, under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Brickcraft, LLC on July 3, 2006, requesting to transition from its MSOP to a Part 70 Operating Permit. During the review of this application, IDEM became aware that equipment had been constructed and operated prior to receipt of the proper permit. The following is a list of the proposed emission units:

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM_{10}, and SO_2 are each equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Permit Level Determination - Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit (tons/yr)**
PM	687.67
PM_{10}	240.90
SO_2	0
VOC	0
CO	0
NO_X	0
Single HAPs	0
Total HAPs	0

Table note: The emission units described by this table are only for equipment that has not received prior construction approval. See Description of Proposed Modification Section above.

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to 326 IAC 2-7-10.5(f)(4) because the potential to emit particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to ten micrometers (PM_{10}) is greater than twenty-five (25) tons per year before control, each. Additionally, the modification will be incorporated into a Part 70 Operating Permit since Brickcraft, LLC is transitioning from its MSOP.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance (tons/year)								
	PM	PM_{10}*	SO_2	NO_x	VOC	CO	Total Fluorides	Total HAPs	Worst Single HAP
Primary Crusher	1.31	0.65	-	-	-	-	-	-	-
Grinding/Scalping Screen	13.69	1.26	-	-	-	-	-	-	-
Transfer Conveyors (125-ton)	2.46	0.90	-	-	-	-	-	-	-
Secondary Crusher	1.16	0.52	-	-	-	-	-	-	-
Transfer Conveyor (110-ton)	1.45	0.53	-	-	-	-	-	-	-
Finishing Screen	7.67	2.67	-	-	-	-	-	-	-
Transfer Conveyors (70-ton)	2.76	1.01	-	-	-	-	-	-	-
Storage Bins	7.88	2.89	-	-	-	-	-	-	-
Transfer Conveyors (60-ton)	2.37	0.87	-	-	-	-	-	-	-
Pugmill	142.96	35.22	-	-	-	-	-	-	-
Extrusion	1.89	1.89	-	-	-	-	-	-	-
Brick Dryer	3.37	8.19	< 249	15.33	1.31	52.56	25.84	24.09	< 10 (HF)
Kiln	16.21	38.11			1.05				
Lime Silo - Receiving	21.90	77.09	-	-	-	-	-	-	-
Lime Silo - Dispensing	0.01	0.00	-	-	-	-	-	-	-
Bicarb Silo - Receiving	21.90	77.09	-	-	-	-	-	-	-
Bicarb Silo - Dispensing	0.00	0.00	-	-	-	-	-	-	-
Insignificant Activities	0.88	0.48	0.01	2.19	0.12	1.84	negl.	0.04	0.04 (hexane)
Total PTE of Entire Source	**249.87**	**249.36**	**< 250**	**17.52**	**2.49**	**54.40**	**25.84**	**24.13**	**< 10 (HF)**
Title V Major Source Thresholds	N/A	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	N/A	N/A

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), not particulate matter (PM), is considered as a "regulated air pollutant".

The operation of this source has the potential to emit greater than 250 tons per year of PM and PM_{10}, each. Therefore, 326 IAC 2-2 would have applied to these facilities. The source has decided to limit their PM, PM_{10}, and SO_2 emissions below the major source threshold as follows:

(a) The PM emissions from the lime silo and sodium bicarbonate silo shall not exceed 5.0 pounds per hour, each.

(b) The PM_{10} emissions from the lime silo and sodium bicarbonate silo shall not exceed 17.6 pounds per hour, each.

(c) The SO_2 emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The dry injection fabric filter (DIFF) for PM and PM_{10} control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(e) The dry injection fabric filter (DIFF) for SO_2 control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the above limits, combined with the unrestricted potential to emit PM and PM_{10} from other emission units at the source, shall limit the PM, PM_{10}, and SO_2 emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable for PM, PM_{10}, and SO_2.

This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

CAM:

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Part 70 Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Primary Crusher (PM)	Baghouse BH-1	Y	1.31	0.66	100	N	---
Grinding/Scalping Screen (PM)	Baghouse BH-1	Y	13.69	6.84	100	N	---
Secondary Crusher (PM)	Baghouse BH-1	Y	1.16	0.58	100	N	---
Finishing Screen (PM)	Baghouse BH-1	Y	7.67	3.83	100	N	---
Pugmill (PM)	Baghouse BH-2	Y	142.96	71.48	100	Y	N
Transfer Conveyor (PM)	Baghouse BH-1	Y	< 2.00	< 2.00	100	N	---
Tunnel Kiln (PM)	Dry Injection Fabric Filter (DIFF)	Y	16.21	1.37	100	N	N
Tunnel Kiln (PM_{10})	Dry Injection Fabric Filter (DIFF)	Y	38.11	3.23	100	N	N
Tunnel Kiln (SO_2)	Dry Injection Fabric Filter (DIFF)	Y	990.98	> 100	100	Y	Y
Tunnel Kiln (HF)	Dry Injection Fabric Filter (DIFF)	Y	16.21	< 10	10	Y	N
Tunnel Kiln (HCl)	Dry Injection Fabric Filter (DIFF)	N	7.45	---	10	N	---
Lime Silo (PM)	Dry Injection Fabric Filter (DIFF)	Y	343.83	0.97	100	Y	N
Lime Silo (PM_{10})	Dry Injection Fabric Filter (DIFF)	Y	120.45	0.54	100	Y	N
Bicarb Silo (PM)	Dry Injection Fabric Filter (DIFF)	Y	343.83	0.97	100	Y	N
Bicarb Silo (PM_{10})	Dry Injection Fabric Filter (DIFF)	Y	120.45	0.54	100	Y	N

(b) Based upon this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the tunnel kiln for SO_2. The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

(c) Based upon this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the following emission units upon issuance of the Title V Renewal:

- The pugmill for PM;
- The tunnel kiln for HF;
- The lime silo for PM/PM_{10}; and
- The sodium bicarbonate silo for PM/PM_{10}.

These CAM plans will be incorporated into this Part 70 permit at the time of its renewal.

NSPS:

(b) Brickcraft, LLC is not subject to the requirements of the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, because each of the storage tanks has an individual volume less than the Subpart Kb applicability limit of 75 cubic meters (19,800 gallons).

(c) Brickcraft, LLC is not subject to the requirements of the Standards of Performance for Metallic Mineral Processing Plants, 40 CFR 60.380, Subpart LL, because the source does not produce metallic mineral concentrates from ore.

(d) According to the Technical Support Document (TSD) for the New Source Construction Permit and Minor Source Operating Permit M021-18273-00054, issued March 1, 2004, the one (1) pre-kiln clay/shale/fireclay/sand processing operation (EU-02) which exhausts inside the building was not subject to 40 CFR 60, Subpart OOO. However, pursuant to 40 CFR 60.672, "no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility and stack emissions". Therefore, the pre-kiln clay/shale/fireclay/sand processing operation (EU-02) is subject to the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO, which is incorporated by reference as 326 IAC 12, and has been included as follows:

(1) Truck dumping (with the use of front end loaders) into the primary crusher is not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO, because, pursuant to 40 CFR 60.672(d), the process is exempt from the requirements of this section.

(2) The following facilities are not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO:

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(d) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry lime injection fabric filter (DIFF).

Insignificant Activities

(i) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

According to to EPA's Applicability Determination Index (ADI) database (http://www.epa.gov/compliance/monitoring/programs/caa/adi.html) posting dated August 15, 2002 (Control Number: 0200088), since the aggregate coming from the crushed material storage bins is used in the manufacture of brick rather than being crushed or ground, all emission units following the storage bins are not affected facilities in a production line at a nonmetallic mineral processing plant. Therefore, the facilities listed above are not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO.

(3) Pursuant to 40 CFR 60.670(a)(1), the provisions of Subpart OOO are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck, or railcar loading station. The specific facilities include the following:

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

Pursuant to 40 CFR 60.670(e), the Permittee shall comply with the requirements of 40 CFR 60, Subpart OOO upon the issuance of this permit.

The entire rule has been included as Attachment B to the permit. The facilities of the pre-kiln clay/shale/fireclay/sand processing operation (EU-02) listed above are subject to the following portions of 40 CFR 60, Subpart OOO:

(1) 40 CFR 60.670(a), (d), (e), (f);
(2) 40 CFR 60.671;
(3) 40 CFR 60.672(b), (d), (e)(1), (f);
(4) 40 CFR 60.673;
(5) 40 CFR 60.675(a), (c)(1)(i), (c)(1)(ii), (c)(2), (c)(3), (d)(2), (e), (g), (i);
(6) 40 CFR 60.676(a), (f), (h), (i)(1), (j), (k);
(7) Table 1 to 40 CFR 63, Subpart OOO; and
(8) Table 3 to 40 CFR 63, Subpart OOO.

(e) Brickcraft, LLC is not subject to the requirements of the Standards of Performance for Calciners and Dryers in Mineral Industries, 40 CFR 60.730, Subpart UUU, because only the calcining and drying of raw materials prior to firing of the brick are covered under this subpart. The brick dryer and kiln operations are for drying bricks and not drying raw materials.

NESHAP:

(f) Brickcraft, LLC is not subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR Part 63.460, Subpart T, because the source does not utilize degreasing operations.

(g) Brickcraft, LLC is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, 40 CFR 63.1340, Subpart LLL, because this source does not manufacture Portland cement.

(h) Brickcraft, LLC is not subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63.6580, Subpart ZZZZ, because the source does not utilize emergency generators or stationary fire pumps.

(i) Brickcraft, LLC is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants For Lime Manufacturing Plants, 40 CFR 63.7080, Subpart AAAAA, because this source does not manufacture lime.

(j) The requirements of the following NESHAPs under 40 CFR Part 63 are not included in the permit:

- NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480, Subpart DDDDD);
- NESHAP for Brick and Structural Clay Products Manufacturing (40 CFR 63.8380, Subpart JJJJJ);
- NESHAP for Clay Ceramics Manufacturing (40 CFR 63.8530, Subpart KKKKK); and
- NESHAP for Refractory Products Manufacturing (40 CFR 63.9780, Subpart SSSSS).

These NESHAPs apply only to major sources of hazardous air pollutants. Since the limited potential to emit of any single HAP is less than 10 tons per year and the potential to emit of all combined HAPs is less than 25 tons per year, Brickcraft, LLC is an area source of HAPs; therefore, Brickcraft, LLC is not subject to these NESHAPs.

(k) Brickcraft, LLC is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR 63.11110, Subpart CCCCCC, because the source dispenses diesel fuel, not gasoline.

(l) Brickcraft, LLC is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers, 40 CFR 63.11193, Subpart JJJJJJ, because the source does not utilize boilers.

(m) Brickcraft, LLC is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing Area Sources, 40 CFR 63.11435, Subpart RRRRRR, because the source does not meet the definition of a clay ceramics manufacturing facility, as defined in 40 CFR 63.11444.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (PSD)
The source's unrestricted PTE of PM, PM_{10}, and SO_2 is greater than the PSD major threshold of 250 tons per year, each. However, the source has elected to accept limits making this a minor source. The limitations are more fully discussed in the Potential to Emit After Issuance section of the permit.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM_{10} is less than 250 tons per year each; and the potential to emit of CO, NO_x, and SO_2 is less than 2,500 tons per year each. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2012, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
Pursuant to 326 IAC 6-5-1(b), 326 IAC 6-5 applies to any new source of fugitive particulate matter emissions, located anywhere in the state, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985. MSOP M021-18273-00054 was issued for Brickcraft, LLC on March 1, 2004. Brickcraft, LLC has fugitive emissions greater than 25 tons; therefore, 326 IAC 6-5 applies to the source.

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations), fugitive particulate matter emissions shall be controlled according to the attached Fugitive Dust Control Plan in Attachment A.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
326 IAC 8-1-6 does not apply since the potential VOC emissions from the entire source are less than twenty-five (25) tons per year.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)
The two (2) insignificant petroleum fuel dispensing facilities, known as Main and Quarry, do not meet the definition of a "gasoline dispensing facility" because, pursuant to 326 IAC 8-4-6(a)(8), diesel fuel is not considered to be a motor vehicle fuel. Therefore, the requirements of 326 IAC 8-4-6 are not applicable.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
This source is located in Clay County. Therefore, the requirements of 326 IAC 8-9 are not applicable.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
Although this is a stationary source of CO emissions commencing operation after March 21, 1972, there are no applicable CO emission limits for this type of source pursuant to 326 IAC 9-1-2. Therefore, 326 IAC 9-1 does not apply.

326 IAC 10-1 (Nitrogen Oxide Emission Limitations)
The plant is not subject to the requirements of 326 IAC 10-1 (Nitrogen Oxide Emission Limitations) because the plant is not located in Clark County or Floyd County.

State Rule Applicability – Individual Facilities

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

(a) The operation of each of the following facilities will emit less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs:

(1) One (1) brick dryer, and

(2) Three (3) torpedo heaters.

Therefore, 326 IAC 2-4.1 does not apply to these facilities.

(b) The operation of the tunnel kiln has the potential to emit greater than 10 tons per year of HF. Therefore, 326 IAC 2-4.1 would have applied to this facility. The source has decided to limit its HF emissions below the major source threshold as follows:

(1) The HF emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln shall not exceed 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The dry injection fabric filter (DIFF) for HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the above limits, combined with the potential to emit HF from other emission units at the source, shall limit the HF emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for HF. This shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable for HF.

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

(a) Pursuant to 326 IAC 6-3-1(b)(14), the following facilities are exempt from 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because potential emissions from each of these facilities are less than 0.551 pound per hour:

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, using baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

Insignificant Activities

(i) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

The dispensing of material from both of the storage silos is also exempt from 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because potential emissions from silo dispensing are less than 0.551 pound per hour, each.

(b) 326 IAC 6-3-2 does not apply to the pre-kiln clay/shale/fireclay/sand processing operation (EU-02) if the limitation established in the rule is not consistent with applicable limitations in 40 CFR 60, Subpart OOO pursuant to 326 IAC 12. Since EU-02 is enclosed in a building and its emissions do not pass through a vent (as defined in 40 CFR 60.671), there are no applicable PM limits established by Subpart OOO. Therefore, EU-02 is subject to the requirements of 326 IAC 6-3-2.

(c) Pursuant to 326 IAC 6-3-2, the Permittee shall comply with the PM limits, when operating at the associated process weight rates, as shown in the table below:

Unit	Process Weight Rate (tons/hr)	PM Limit (lb/hr)
Grinding and Scalping Screen Operation	125	53.5
Finishing Screen Operation	70	47.8
Pugmill	60	46.3
Brick Dryer	9.05	17.9
Tunnel Kiln	9.05	17.9
Lime Storage Silo - Receiving	25	35.4
Bicarbonate Storage Silo - Receiving	25	35.4

The pounds per hour limitations were calculated with the following equation:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in 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:

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

The following facilities are capable of complying with these particulate limits without the use of control devices: grinding and scalping screen operation, finishing screen operation, pugmill, brick dryer, and tunnel kiln.

The dry injection fabric filter (DIFF) shall be in operation at all times the lime storage silo and/or the sodium bicarbonate storage silo are being loaded, in order to comply with these particulate limits.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This rule requires all facilities with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide to comply with the emission limitations and test compliance methods stated in the rule. The kiln has the potential to emit twenty-five (25) tons per year and ten (10) pounds per hour of sulfur dioxide; however, natural gas is the only fuel used at the source. There are no limits under this rule for natural gas combustion or for non-combustion sources of sulfur dioxide. Therefore, 326 IAC 7-1.1 does not apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 determination requirements applicable to Brickcraft, LLC are as follows:

(a) Testing Requirements

Emission Unit(s)	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Tunnel Kiln	Dry injection fabric filter (DIFF)	Within 5 years of previous test	SO_2	Once every 5 years	5.41 lb/ton of fired product, when determining compliance without a CEMS
Tunnel Kiln	Dry injection fabric filter (DIFF)	Within 5 years of previous test	HF	Once every 5 years	0.22 lb/ton of fired product, when determining compliance without a CEMS

Compliance with the PSD minor limits for PM and PM_{10} in Conditions D.3.1(a) and D.3.1(b) does not need to be determined by a performance stack test at this time because the minor limits greatly exceed the calculated emissions at 8,760 hours of loading per year, and the emission units are projected to require fewer than 30 hours of loading per year, each. However, IDEM, OAQ may require stack testing at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11.

(b) Emission Controls Operation

(1) The dry injection fabric filter (DIFF) for PM and PM_{10} control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(2) When determining compliance with Conditions D.3.1(c) and D.3.2(a) without the use of a CEMS, the dry injection fabric filter (DIFF) for SO_2 and HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

(c) Emission Calculations
SO_2 and HF emissions shall be calculated using the given formulas in Conditions D.3.7 and D.3.8.

(d) Sulfur Content Determination
The sulfur content of the aggregate feedstock shall be determined using methods in Condition D.3.9.

(e) Continuous Emissions Monitoring

(1) In order to determine compliance with Conditions D.3.1(c) and D.3.2(a), the Permittee shall install, calibrate, maintain, operate, and certify a continuous emission monitoring system (CEMS) and related equipment for measuring SO_2 and HF emissions from the tunnel kiln in accordance with 326 IAC 3-5.

(2) The SO_2 and HF CEMS shall be operated at all times the tunnel kiln is in operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.

These requirements are required to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 40 CFR 64 (CAM) and to render 326 IAC 2-2 (PSD) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

The compliance monitoring requirements applicable to Brickcraft, LLC are as follows:

(a) Emissions Monitoring
When determining compliance with Conditions D.3.1(c) and D.3.2(a) with the use of a CEMS, whenever the CEMS is down for more than twenty-four (24) hours, a calibrated backup CEMS shall be brought online within twenty-four (24) hours of shutdown of the primary CEMS, if possible. If this is not possible, the requirements in Condition D.3.14(b) shall be conducted to allow for determination of compliance with the SO_2 and HF emission limits.

(b) Visible Emissions Notations

The Permittee shall perform daily visible emission notations of the dry injection fabric filter (DIFF) exhaust.

(c) Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the dry injection fabric filter (DIFF) at least once per day when the tunnel kiln, lime silo, and/or sodium bicarbonate silo are in operation.

(d) SO_2 Compliance Assurance Monitoring

(1) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS.

(2) When determining compliance without the use of a CEMS:

(A) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) continuously.

(B) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) continuously.

(C) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day.

(D) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day.

(e) HF Compliance Assurance Monitoring

(1) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS.

(2) When determining compliance without the use of a CEMS:

(A) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) once per day.

(B) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) once per day.

(C) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day.

(D) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day.

(f) Broken or Failed Bag Detection

The Permittee shall maintain the dry injection fabric filter (DIFF) and shall replace broken or failed bags as needed.

These monitoring conditions are necessary because the control devices for the facility must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 40 CFR 64 (CAM), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Part 70 Operating Permit 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 application for the purposes of this review was received on July 3, 2006. Additional information was received on March 26, 2007; April 3, 2007; December 11, 2008; July 29, 2009; August 7, 2009; September 9, 2009; December 21, 2009; February 2, 2010; June 3, 2010; September 8, 2010; October 6, 2010; October 21, 2010; February 7, 2011; and March 11, 2011.

Conclusion

The construction and operation of this stationary brick manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 021-30024-00054 and Part 70 Operating Permit No. T021-23323-00054.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to John Haney at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations
Emissions Summary

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Uncontrolled Emissions (tons/year)

Emission Units		PM	PM_{10}	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
Primary Crusher		1.31	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding/Scalping Screen		13.69	1.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (125-ton)		2.46	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Secondary Crusher		1.16	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyor (110-ton)		1.45	0.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Finishing Screen		7.67	2.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (70-ton)		2.76	1.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Storage Bins		7.88	2.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (60-ton)		2.37	0.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pugmill		142.96	35.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Extrusion		1.89	1.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Brick Dryer		3.37	8.19	1095.00	15.33	1.31	52.56	25.84	16.21	7.45	24.09
Natural Gas-Fired Kiln		16.21	38.11			1.05					
Lime Silo - Receiving		343.83	120.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lime Silo - Dispensing		0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Receiving		343.83	120.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Dispensing		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	Additive Feeder	0.08	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Surge Bin	0.26	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Texture Feeder	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Packaging	0.50	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Space Heaters	0.04	0.17	0.01	2.19	0.12	1.84	0.00	0.00	0.00	0.04
Total	**Total**	**893.73**	**336.08**	**1095.01**	**17.52**	**2.49**	**54.40**	**25.84**	**16.21**	**7.45**	**24.13**

Limited Emissions (tons/year) with the Use of CEMS

Emission Units		PM	PM_{10}	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
Primary Crusher		1.31	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding/Scalping Screen		13.69	1.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (125-ton)		2.46	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Secondary Crusher		1.16	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyor (110-ton)		1.45	0.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Finishing Screen		7.67	2.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (70-ton)		2.76	1.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Storage Bins		7.88	2.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (60-ton)		2.37	0.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pugmill		142.96	35.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Extrusion		1.89	1.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Brick Dryer		3.37	8.19	< 249	15.33	1.31	52.56	25.84	< 10	7.45	24.09
Natural Gas-Fired Kiln		16.21	38.11			1.05					
Lime Silo - Receiving		21.90	77.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lime Silo - Dispensing		0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Receiving		21.90	77.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Dispensing		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	Additive Feeder	0.08	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Surge Bin	0.26	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Texture Feeder	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Packaging	0.50	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Space Heaters	0.04	0.17	0.01	2.19	0.12	1.84	0.00	0.00	0.00	0.04
Total	**Total**	**249.87**	**249.36**	**< 250**	**17.52**	**2.49**	**54.40**	**25.84**	**< 10**	**7.45**	**24.13**

Limited Emissions (tons/year) without the Use of CEMS

Emission Units		PM	PM_{10}	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
Primary Crusher		1.31	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding/Scalping Screen		13.69	1.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (125-ton)		2.46	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Secondary Crusher		1.16	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyor (110-ton)		1.45	0.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Finishing Screen		7.67	2.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (70-ton)		2.76	1.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Storage Bins		7.88	2.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer Conveyors (60-ton)		2.37	0.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pugmill		142.96	35.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Extrusion		1.89	1.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Brick Dryer		3.37	8.19	249.20	15.33	1.31	52.56	25.84	9.73	7.45	24.09
Natural Gas-Fired Kiln		16.21	38.11			1.05					
Lime Silo - Receiving		21.90	77.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lime Silo - Dispensing		0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Receiving		21.90	77.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bicarbonate Silo - Dispensing		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	Additive Feeder	0.08	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Surge Bin	0.26	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Texture Feeder	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Packaging	0.50	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Space Heaters	0.04	0.17	0.01	2.19	0.12	1.84	0.00	0.00	0.00	0.04
Total	**Total**	**249.87**	**249.36**	**249.21**	**17.52**	**2.49**	**54.40**	**25.84**	**9.73**	**7.45**	**24.13**

Appendix A: Emission Calculations
Aggregate Processing (125 TPH) Particulate Emissions

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Controlled Emission Factor (lb/ton)	Controlled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Uncontrolled Emissions (tons/yr)
Primary Crusher	125	PM	0.0012	0.66	Baghouse	50.0	1.31
		PM_{10}	0.00059	0.32	Baghouse	50.0	0.65
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.00059	0.32	Baghouse	50.0	0.65
*SCC# 3-05-020-03**, AP-42, Ch. 11.19, Table 11.19.2-2*							
SCC# 3-05-003-40, AP-42, Ch. 11.3, Table 11.3-2							

** Controlled

BH-1

Allowable Emissions:
The primary crusher is exempt from 326 IAC 6-3-2 because the crusher has potential emissions less than 0.551 lb/hr.

1.31 tons/yr * 2000 lb/ton ÷ 8760 hr/yr = 0.300 lb/hr

Methodology:
Controlled Emissions (tons/yr) = Rate (tons/hr) x Controlled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Uncontrolled Emissions (tons/yr) = Controlled Emissions (tons/yr) ÷ (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Grinding and Screening	125	PM	0.025	13.69	Baghouse	50.0	6.84
		PM_{10}	0.0023	1.26	Baghouse	50.0	0.63
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0023	1.26	Baghouse	50.0	0.63
*SCC# 3-05-003-02**, AP-42, Ch. 11.3, Table 11.3-2*							

** Processing wet material

BH-1

Allowable Emissions:
The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 125 tons/hr
limit = 55.0 x (125 ^0.11) · = 53.5 lb/hr (allowable)

with uncontrolled potential:
13.69 tons/yr x 2000 lb/ton / 8760 hr/yr = 3.13 lb/hr (capable of complying)

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Number of Conveyors	Total Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Transfer Conveyors	125	PM	0.003	1.64	3	4.93	Baghouse	50.0	2.46
		PM_{10}	0.0011	0.60	3	1.81	Baghouse	50.0	0.90
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.60	3	1.81	Baghouse	50.0	0.90
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*									

** Uncontrolled

BH-1

Allowable Emissions:
Each conveyor is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

125 tons/hr * 0.003 lb/ton = 0.375 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Total Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x Number of Conveyors
Controlled Emissions = Total Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Aggregate Processing (110 TPH) Particulate Emissions

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Controlled Emission Factor (lb/ton)	Controlled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Uncontrolled Emissions (tons/yr)
Secondary Crusher	110	PM	0.0012	0.58	Baghouse	50.0	1.16
		PM_{10}	0.00054	0.26	Baghouse	50.0	0.52
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.00054	0.26	Baghouse	50.0	0.52
*SCC# 3-05-020-03**, AP-42, Ch. 11.19, Table 11.19.2-2*							

Allowable Emissions:
The secondary crusher is exempt from 326 IAC 6-3-2 because the crusher has potential emissions less than 0.551 lb/hr.

1.16 tons/yr * 2000 lb/ton ÷ 8760 hr/yr = 0.264 lb/hr

**Uncontrolled Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1 - Control Efficiency/100)

BH-1

Methodology:
Controlled Emissions (tons/yr) = Rate (tons/hr) x Controlled Emission Factor (lbs/ton) x 8760 hrs/yr/2000 lbs/ton
Uncontrolled Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Number of Conveyors	Total Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Transfer Conveyor	110	PM	0.003	1.45	1	1.45	Baghouse	50.0	0.72
		PM_{10}	0.0011	0.53	1	0.53	Baghouse	50.0	0.26
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.53	1	0.53	Baghouse	50.0	0.26
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*									

Allowable Emissions:
Each conveyor is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

110 tons/hr * 0.003 lb/ton = 0.330 lb/hr

** Uncontrolled

BH-1

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr/2000 lbs/ton
Total Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x Number of Conveyors
Controlled Emissions (tons/yr) = Total Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Aggregate Processing (70 TPH) Particulate Emissions

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Screening	70	PM	0.025	7.67	Baghouse	50.0	3.83
		PM_{10}	0.0087	2.67	Baghouse	50.0	1.33
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0087	2.67	Baghouse	50.0	1.33
*SCC# 3-05-020-03**, AP-42, Ch. 11.19, Table 11.19.2-2*							

** Uncontrolled

BH-1

Allowable Emissions:
The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 70 tons/hr
limit = 55.0 x (70 ^0.11) -= 47.8 lb/hr (allowable)

with uncontrolled potential:
7.67 tons/yr x 2000 lb/ton / 8760 hr/yr = 1.75 lb/hr (capable of complying)

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Number of Conveyors	Total Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Transfer Conveyors	70	PM	0.003	0.92	3	2.76	Baghouse	50.0	1.38
		PM_{10}	0.0011	0.34	3	1.01	Baghouse	50.0	0.51
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.34	3	1.01	Baghouse	50.0	0.51
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*									

** Uncontrolled

BH-1

Allowable Emissions:
Each conveyor is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

70 tons/hr * 0.003 lb/ton = 0.210 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Total Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x Number of Conveyors
Controlled Emissions (tons/yr) = Total Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Aggregate Processing (100 TPH) Particulate Emissions

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Number of Bins	Total Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Crushed Material Storage Bin	100	PM	0.003	1.31	6	7.88	Baghouse	50.0	3.94
		PM_{10}	0.0011	0.48	6	2.89	Baghouse	50.0	1.45
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.48	6	2.89	Baghouse	50.0	1.45
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*									

**Use uncontrolled conveyor transfer point emission factors

BH-1

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr÷ 2000 lbs/ton
Total Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x Number of Bins
Controlled Emissions (tons/yr) = Total Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Allowable Emissions:
The storage bins are exempt from 326 IAC 6-3-2 because each bin has potential emissions less than 0.551 lb/hr.

100 tons/hr x 0.003 lb/ton = 0.300 lb/hr

Appendix A: Emission Calculations
Aggregate Processing (60 TPH) Particulate Emissions

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Number of Conveyors	Total Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Transfer Conveyors	60	PM	0.003	0.79	3	2.37	Baghouse	50.0	1.18
		PM_{10}	0.0011	0.29	3	0.87	Baghouse	50.0	0.43
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.29	3	0.87	Baghouse	50.0	0.43
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*									

** Uncontrolled

BH-1

Allowable Emissions:
Each conveyor is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

60 tons/hr * 0.003 lb/ton = 0.180 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Total Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x Number of Conveyors
Controlled Emissions (tons/yr) = Total Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Additive Feeder	6	PM	0.003	0.08	Baghouse	50.0	0.04
		PM_{10}	0.0011	0.03	Baghouse	50.0	0.01
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.03	Baghouse	50.0	0.01
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

BH-1

Allowable Emissions:
The additive feeder is exempt from 326 IAC 6-3-2 because the feeder has potential emissions less than 0.551 lb/hr.

6 tons/hr * 0.003 lb/ton = 0.018 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Surge Bin	20	PM	0.003	0.26	Baghouse	50.0	0.13
		PM_{10}	0.0011	0.10	Baghouse	50.0	0.05
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.10	Baghouse	50.0	0.05
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

BH-1

Allowable Emissions:
The surge bin is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

20 tons/hr * 0.003 lb/ton = 0.060 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Pugmill	60	PM	0.544	142.96	Baghouse	50.0	71.48
		PM_{10}	0.134	35.22	Baghouse	50.0	17.61
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.134	35.22	Baghouse	50.0	17.61
*SCC# 3-05-011-09**, AP-42, Ch. 11.12, Table 11.12-2*							

**Use uncontrolled mixer loading (central mix) emission factors

BH-2

Allowable Emissions:
The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 60 tons/hr
limit = 55.0 x (60 ^0.11) = 46.3 lb/hr (allowable)

with uncontrolled potential:
142.96 tons/yr x 2000 lb/ton / 8760 hr/yr = 32.64 lb/hr (capable of complying)

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Controlled Emission Factor (lb/ton)	Controlled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Uncontrolled Emissions (tons/yr)
Extrusion Operation	60	PM	0.0036	0.95	see note**	50.0	1.89
		PM_{10}	0.0036	0.95	see note**	50.0	1.89
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0036	0.95	see note**	50.0	1.89
*SCC# 3-05-003-42**, AP-42, Ch. 11.3, Table 11.3-2*							

**Emission factor includes the use of a fabric filter control device

Allowable Emissions:
The extrusion operation is exempt from 326 IAC 6-3-2 because the operation has potential emissions less than 0.551 lb/hr.

1.89 tons/yr * 2000 lb/ton ÷ 8760 hr/yr = 0.432 lb/hr

Methodology:
Controlled Emissions (tons/yr) = Rate (tons/hr) x Controlled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Uncontrolled Emissions = Controlled Emissions (tons/yr) ÷ (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Texture Feeder	0.25	PM	0.003	0.0033	Baghouse	50.0	0.00
		PM_{10}	0.0011	0.0012	Baghouse	50.0	0.00
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.0012	Baghouse	50.0	0.00
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

BH-2

Allowable Emissions:
The texture feeder is exempt from 326 IAC 6-3-2 because each conveyor has potential emissions less than 0.551 lb/hr.

0.25 tons/hr * 0.003 lb/ton = 0.001 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Packaging	38	PM	0.003	0.50	Baghouse	50.0	0.25
		PM_{10}	0.0011	0.18	Baghouse	50.0	0.09
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.18	Baghouse	50.0	0.09
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

BH-2

Allowable Emissions:
The packaging operation is exempt from 326 IAC 6-3-2 because it has potential emissions less than 0.551 lb/hr.

38.00 tons/hr * 0.003 lb/ton = 0.114 lb/hr

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Brick Dryer

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Brick Dryer	10.00	PM	0.077	3.37	none	0.0	3.37
		PM_{10}	0.187	8.19	none	0.0	8.19
Source of Criteria		$PM_{2.5}$	0.187	8.19	none	0.0	8.19
Pollutant Factors:		SO_2	*see note	0.00	none	0.0	0.00
SCC# 3-05-003-50		NO_x	*see note	0.00	none	0.0	0.00
AP-42 Ch. 11.3		VOC	0.03	1.31	none	0.0	1.31
		CO	*see note	0.00	none	0.0	0.00
		fluorides	*see note	0.00	none	0.0	0.00
		HF	*see note	0.00	none	0.0	0.00
		HCl	*see note	0.00	none	0.0	0.00
		total HAPs	*see note	0.00	none	0.0	0.00

* These emissions have been included with the kiln.

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.00 tons/hr
limit = 4.1 x (10.00 ^0.67) = 19.18 lb/hr (allowable)

with uncontrolled potential:
3.37 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.77 lb/hr (capable of complying)

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Factor (lbs/ton) x 8760 hrs/yr÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Natural Gas-Fired Kiln

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Natural Gas-Fired Kiln	10.00	PM	0.37	16.21	DIFF	50.0	8.10
(with no back-up fuel)		PM_{10}	0.87	38.11	DIFF	50.0	19.05
		$PM_{2.5}$	0.87	38.11	DIFF	50.0	19.05
Source of Criteria		SO_2	25.00	1095.00	DIFF	* see below	249.20
Pollutant Factors:		NO_x	0.35	15.33	none	0.0	15.33
SCC# 3-05-003-11		VOC	0.024	1.05	none	0.0	1.05
AP-42 Ch. 11.3		CO	1.2	52.56	none	0.0	52.56
		fluorides	0.59	25.84	DIFF	40.0	15.52
		HF	0.37	16.21	DIFF	* see below	9.73
		HCl	0.17	7.45	DIFF	40.0	4.47
		total HAPs	0.55	24.09	DIFF	40.0	14.46

SO_2 emissions when bypassing the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (25.00 lb/ton) x (125 hr/yr) x (1 ton/2000 lb) = 15.63 tpy
SO_2 emissions controlled by the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (5.41 lb/ton) x (8635 hr/yr) x (1 ton/2000 lb) = 233.58 tpy
249.20 tpy

HF emissions when bypassing the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.37 lb/ton) x (125 hr/yr) x (1 ton/2000 lb) = 0.23 tpy
HF emissions controlled by the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.22 lb/ton) x (8635 hr/yr) x (1 ton/2000 lb) = 9.50 tpy
9.73 tpy

(16.21 - 9.73) ÷ 16.21 x 100 = 40.0 % CE

Allowable Emissions:
The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.00 tons/hr
limit = 4.1 x (10.00 ^0.67) = 19.18 lb/hr (allowable)

with uncontrolled potential:
16.21 tons/yr x 2000 lb/ton / 8760 hr/yr = 3.70 lb/hr (capable of complying)

Methodology:
Emission factor for SO_2 is from mass balance using worse case material while keeping the source below 250 tpy after control.
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
One (1) Storage Silo - Powdered Lime - Receiving

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

1. Process Descriptions:

The lime is delivered via tank trucks, and the silo is filled pneumatically.
The DIFF is used to equalize the pressure and to prevent material from being emitted to the atmosphere.

Max Throughput: **25.0 tons/hr**

Uncontrolled Emission Factors		**Controlled Emission Factors**	
PM Emission Factor:	**3.14 lbs/ton**	**PM Emission Factor:**	**0.0089 lbs/ton**
PM_{10} Emission Factor:	**1.10 lbs/ton**	**PM_{10} Emission Factor:**	**0.0049 lbs/ton**
$PM_{2.5}$ Emission Factor:	**1.10 lbs/ton**	**$PM_{2.5}$ Emission Factor:**	**0.0049 lbs/ton**

Emission Factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17
(Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06).
$PM_{2.5}$ has been assumed equal to PM_{10}.
There is no emission factor for lime loading in AP-42.

2. Potential Uncontrolled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25.0	343.83	120.45	120.45

3. Controlled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25.0	0.97	0.54	0.54

4. Limited Emissions:

PM emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.200 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 21.90 tpy
(25.0 tons/hr) x (0.200 lb/ton) = 5.00 lb/hr

PM_{10} emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.704 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 77.09 tpy
(25.0 tons/hr) x (0.704 lb/ton) = 17.60 lb/hr

5. Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 25 tons/hr
limit = 4.1 x (25 ^0.67) = 35.4 lb/hr (allowable)

with uncontrolled potential:
343.83 tons/yr x 2000 lb/ton / 8760 hr/yr = 78.50 lb/hr (will not comply)

with controlled potential:
0.97 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.22 lb/hr (capable of complying)

Methodology
Emissions (tons/yr) = Throughput (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr÷ 2000 lb/ton

Appendix A: Emission Calculations
One (1) Storage Silo - Powdered Lime - Dispensing

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Max Throughput: **1042 lb/hr**

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Lime Dispensing/Injecting	0.521	PM	0.003	0.01	DIFF	50.0	0.00
		PM_{10}	0.0011	0.00	DIFF	50.0	0.00
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.00	DIFF	50.0	0.00
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

Methodology:
Maximum Throughput (125 lb/hr using 12% motor output) = 125 lb/hr÷ 0.12 = 1042 lb/hr
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Allowable Emissions:
The lime dispensing system is exempt from 326 IAC 6-3-2 because the system has potential emissions less than 0.551 lb/hr.

0.521 tons/hr x 0.003 lb/ton = 0.002 lb/hr

Appendix A: Emission Calculations
One (1) Storage Silo - Sodium Bicarbonate - Receiving

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

1. Process Descriptions:

The sodium bicarbonate is delivered via tank trucks, and the silo is filled pneumatically.
The DIFF is used to equalize the pressure and to prevent material from being emitted to the atmosphere.

Max Throughput: **25.0 tons/hr**

Uncontrolled Emission Factors		**Controlled Emission Factors**	
PM Emission Factor:	**3.14 lbs/ton**	**PM Emission Factor:**	**0.0089 lbs/ton**
PM_{10} Emission Factor:	**1.10 lbs/ton**	**PM_{10} Emission Factor:**	**0.0049 lbs/ton**
$PM_{2.5}$ Emission Factor:	**1.10 lbs/ton**	**$PM_{2.5}$ Emission Factor:**	**0.0049 lbs/ton**

Emission Factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17
(Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06).
$PM_{2.5}$ has been assumed equal to PM_{10}.
There is no emission factor for sodium bicarbonate loading in AP-42.

2. Potential Uncontrolled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25	343.83	120.45	120.45

3. Controlled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25	0.97	0.54	0.54

4. Limited Emissions:

PM emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.200 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 21.90 tpy
(25.0 tons/hr) x (0.200 lb/ton) = 5.00 lb/hr

PM_{10} emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.704 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 77.09 tpy
(25.0 tons/hr) x (0.704 lb/ton) = 17.60 lb/hr

5. Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 25 tons/hr
limit = 4.1 x (25 ^0.67) = 35.4 lb/hr (allowable)

with uncontrolled potential:
343.83 tons/yr x 2000 lb/ton / 8760 hr/yr = 78.50 lb/hr (will not comply)

with controlled potential:
0.97 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.22 lb/hr (capable of complying)

Methodology
Emissions (tons/yr) = Throughput (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr÷ 2000 lb/ton

Appendix A: Emission Calculations
One (1) Injection System - Sodium Bicarbonate - Dispensing

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Max Throughput: **545 lb/hr**

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Sodium Bicarbonate Dispensing/Injecting	0.273	PM	0.003	0.00	DIFF	50.0	0.00
		PM_{10}	0.0011	0.00	DIFF	50.0	0.00
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	0.00	DIFF	50.0	0.00
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

Methodology:
Maximum Throughput (60 lb/hr using 11% motor output) = 60 lb/hr÷ 0.11 = 545 lb/hr
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Allowable Emissions:
The bicarbonate dispensing system is exempt from 326 IAC 6-3-2 because the system has potential emissions less than 0.551 lb/hr.

0.273 tons/hr x 0.003 lb/ton = 0.001 lb/hr

Appendix A: Emissions Calculations
Natural Gas Combustion Only (MMBtu/hr <100)

Company Name: Brickcraft, LLC
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Permit No: T021-23323-00054
Plant ID: 021-00054
Reviewer: John Haney
Date: March 29, 2011

Combined Heat Input Capacity MMBtu/hr	Potential Throughput MMcf/yr
5.1	43.8

	Pollutant						
	PM*	PM_{10}*	$PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emissions in tons/yr	0.04	0.17	0.17	0.01	2.19	0.12	1.84

* PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.

** Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emissions in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Methodology:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMcf = 1,000,000 cubic feet of gas
Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (Supplement D 3/98).
Potential Throughput (MMcf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMcf/1,020 MMBtu
Potential Emissions (tons/yr) = Throughput (MMcf/yr) x Emission Factor (lb/MMcf)÷ 2,000 lb/ton

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

April 8, 2011

Mr. Roy Lamar
Brickcraft, LLC
200 North SR 59
Center Point, IN 47840

Re: Public Notice
Brickcraft, LLC
Permit Level: Title V & Title V - Significant Source Modification
Permit Number: 021 - 23323 - 00054 & 021 - 30024 - 00054

Dear Mr. Lamar:

Enclosed is a copy of your draft Title V & Title V - Significant Source Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Brazil Public Library, 204 N Walnut St in Brazil IN and Clay County Genealogy Library, 309 East Main Street in Center Point IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Brazil Times in Brazil, In publish this notice no later than April 13, 2011.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to John Haney, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5328 or dial (317) 234-5328.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 8, 2011

Brazil Times
Attn: Classifieds
100 North Meridian
Brazil, Indiana 47834

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Brickcraft, LLC, Clay County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 13, 2011.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V & Title V - Significant Source Modification
Permit Number: 021 - 23323 - 00054 & 021 - 30024 - 00054

Enclosure
PN Newspaper.dot 3/27/08

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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April 8, 2011

To: Clay County Genealogy Library & Brazil Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Brickcraft, LLC
Permit Number: 021 - 23323 - 00054 & 021 - 30024 - 00054

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Notice of Public Comment

April 8, 2011
Brickcraft, LLC
021 - 23323 - 00054 & 021 - 30024 - 00054

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

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Indianapolis, Indiana 46204
(317) 232-8603
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www.idem.IN.gov

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

April 8, 2011

A 30-day public comment period has been initiated for:

Permit Number: **021 - 23323 - 00054 & 021 - 30024 - 00054**
Applicant Name: **Brickcraft, LLC**
Location: **Center Point, Clay County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Mail Code 61-53

IDEM Staff	LPOGOST 4/8/2011 Brickcraft, LLC 021 - 23323 - 00054 & 021 - 30024 - 00054 draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Roy Lamar Brickcraft, LLC 200 North SR 59 Center Point IN 47840 (Source CAATS)									
2		Bill Mast President Brickcraft, LLC 1946 Turner Ave. NW Grand Rapids MI 49504 *(RO CAATS)*									
3		Brazil Public Library 204 N Walnut St Brazil IN 47834-2297 *(Library)*									
4		Clay County Health Department 1214 E National Ave #B110 Brazil IN 47834-2718 *(Health Department)*									
5		Center Point Town Council P.O. Box 177 Center Point IN 47840 *(Local Official)*									
6		Clay County Board of Commissioners 609 E. National St. Brazil IN 47834 *(Local Official)*									
7		James & Margaret Butt 087 E SR 46 Center Point IN 47840 *(Affected Party)*									
8		Ephrian Edwards 340 E Private Road 10 Center Point IN 47840 *(Affected Party)*									
9		Mr. Harold J. Bitzegaio 525 S Brown Ave. Terre Haute IN 47803 *(Affected Party)*									
10		Bonny & Thelma Lynch & Knust 370 E Ashboro Road Center Point IN 47840 *(Affected Party)*									
11		Leland Sutton 482 E Ashboro Center Point IN 47840 *(Affected Party)*									
12		Mr. Leroy Sutton 422 E Ashboro Road Center Point IN 47840 *(Affected Party)*									
13		Clay County Highway Department 409 N SR 59 Center Point IN 47840 (Affected State)									
14		Jim Heim Bruce Carter Associates, LLC 616 South 4th Street Elkhart IN 46516 *(Consultant)*									
15		Clay County Genealogy Library 309 East Main Street Center Point IN 47840 *(Library)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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