



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant
DATE: November 21, 2007
RE: City of Fort Wayne Street Dept. / 003-24296-00293
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**City of Fort Wayne Street Department
1701 South Lafayette St.
Fort Wayne, Indiana 46803**

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

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

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

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

Operation Permit No.: F003-24296-00293	
Issued by: Original signed by Matt Stuckey Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 21, 2007 Expiration Date: November 21, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary drum mix asphalt plant.

Source Address:	1701 South Lafayette St., Fort Wayne, Indiana 46803
Mailing Address:	1701 South Lafayette St., Fort Wayne, Indiana 46803
General Source Phone Number:	(260) 427-1491
SIC Code:	9199 and 2951
County Location:	Allen
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) drum mixer, identified as SJG#4200, with a maximum capacity of 120 tons of asphalt per hour, using Baghouse, identified as BC1, as control, constructed 1999, and exhausting to stack S₁.
- (b) One (1) natural gas-fired drum dryer, constructed in 1999, exhausting through Baghouse, identified as BC1, and Stack S₁, rated at thirty-seven (37) million British thermal units per hour.
- (c) One (1) 56 foot drag conveyor, identified as DC₁, constructed in 1999.
- (d) Four (4) cold feed bins, collectively identified as CFB₁, constructed in 1999, with a capacity of 118.75 tons of wet aggregate per hour, total.
- (e) Four (4) aggregate bins used to store limestone, identified as #9, #11, #12 and #13, constructed in 1999, with a capacity of 8,925 cubic feet, each.
- (f) Two (2) asphalt storage tanks, identified as AT₁ and AT₂, constructed in 1975, with a capacity of 8,000 gallons and 20,000 gallons, respectively.
- (g) One (1) asphalt emulsion storage tank, identified as AE₁, constructed in 1985 with a capacity of 8,000 gallons.
- (h) One (1) dust storage bin, exhausting back to the drum mixer, constructed in 1999.

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

This stationary source also includes the following insignificant activities:

- (a) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (b) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (c) Covered conveyers for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (d) One (1) natural gas-fired hot oil heater, with a capacity of 0.6 million British thermal units per hour [326 6-2-4].

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F003-24296-00293, 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, until the renewal permit has been issued or denied.

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

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

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

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

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 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F003-24296-00293 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue

MC 61-52 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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) drum mixer, identified as SJG#4200, with a maximum capacity of 120 tons of asphalt per hour, using Baghouse (BC1) as control, constructed 1999, and exhausting to stack S₁.
- (b) One (1) natural gas-fired drum dryer, constructed in 1999, exhausting through Baghouse (BC1) and Stack S₁, rated at thirty-seven (37) million British thermal units per hour.
- (c) One (1) 56 foot drag conveyor, identified as DC₁.
- (d) Four (4) cold feed bins, collectively identified as CFB₁, constructed in 1999, with a capacity of 118.75 tons of wet aggregate per hour, total.
- (e) Four (4) aggregate bins used to store limestone, identified as #9, #11, #12 and #13, constructed in 1999, with a capacity of 8,925 cubic feet, each.
- (f) Two (2) asphalt storage tanks, identified as AT₁ and AT₂, constructed in 1975, with a capacity of 8,000 gallons and 20,000 gallons, respectively.
- (g) One (1) asphalt emulsion storage tank, identified as AE₁, constructed in 1985 with a capacity of 8,000 gallons.
- (h) One (1) dust storage bin, exhausting back to the drum mixer.

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

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

D.1.1. Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 2-8-4][326 IAC 8-5-2]

- (a) The VOC emissions from the use of liquid binders in cold mix asphalt production shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall be achieved by limiting the total VOC usage of any selected binder to less than or equal to the stated limit in (c) for that binder during the last twelve (12) months. When more than one binder is used, the formula in (c)(6) must be applied so that the total VOC emitted does not exceed 99.0 tons per twelve (12) consecutive month period.

Liquid binders used in the production of cold mix asphalt shall be defined as follows:

- (1) Cut back asphalt rapid cure, containing a maximum of 25.3% of the liquid binder by weight of VOC solvent and 95% by weight of VOC solvent evaporating.
- (2) Cut back asphalt medium cure, containing a maximum of 28.6% of the liquid binder by weight of VOC solvent and 70% by weight of VOC solvent evaporating.
- (3) Cut back asphalt slow cure, containing a maximum of 20% liquid binder by weight of VOC solvent and 25% by weight of VOC solvent evaporating.

- (4) Emulsified asphalt with solvent, containing a maximum of 15% of liquid binder by weight of VOC solvent and 46.4% by weight of the VOC solvent in the liquid blend evaporating. The percent of oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
- (5) Other asphalt with solvent binder, containing a maximum 25.9% of the liquid binder of VOC solvent and 2.5% by weight of the VOC solvent evaporating.

The liquid binder used in cold mix asphalt production shall be limited as follows:

- (1) Cutback asphalt rapid cure liquid binder usage shall not exceed 99.0 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the month.
- (2) Cutback asphalt medium cure liquid binder usage shall not exceed 134 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the month.
- (3) Cutback asphalt slow cure liquid binder usage shall not exceed 376 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of each month.
- (4) Emulsified asphalt with solvent liquid binder usage shall not exceed 205 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the each month.
- (5) Other asphalt with solvent liquid binder shall not exceed 3762 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of each month.
- (6) When more than one type of binder is used per twelve (12) month consecutive period, the total usage of all binders shall be adjusted to an equivalent amount of rapid cure liquid binder. The total equivalent rapid cure liquid binder usage shall be limited to less than or equal to 82.28 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.

In order to determine the equivalent rapid cure liquid binder usage for each type of binder, use the following formula and divide the tons of VOC solvent used per year for each type of binder by the corresponding adjustment ration listed in the table that follows.

$$\begin{array}{l} \text{Equivalent Rapid Cure} \\ \text{Liquid Binder Usage} \\ \text{(tons/year)} \end{array} = \frac{\text{VOC solvent used for each binder (tons/year)}}{\text{Adjustment Ratio}}$$

Type of binder	VOC solvent used (tons/year)	Adjustment Ratio	Equivalent Rapid Cure Liquid Binder Usage (tons/year)
cutback asphalt rapid cure		1	
cutback asphalt medium cure		1.36	
cutback asphalt slow cure		3.8	
emulsified asphalt		2.04	
other asphalt		38	

Compliance with these limits combined with the potential emissions from all other emission units at this source shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

- (b) Pursuant to 326 IAC 8-5-2, the Permittee shall not allow the use of asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion, except as used for the following purposes:
- (1) penetrating prime coating;
 - (2) stockpile storage mix; and
 - (3) application during the months of November, December, January, February, and March.

D.1.2 Particulate Matter (PM₁₀) [326 IAC 2-8-4][326IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the aggregate dryer/mixer shall not exceed 0.17 pound per ton of asphalt processed. This will limit the total source potential to emit PM₁₀ to less than 100 tons per twelve consecutive month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply. Compliance with this limit shall also ensure that the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD) are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 2-2][40 CFR 60.92][326 IAC 12-1]

- (a) The potential to emit PM from the aggregate dryer/mixer shall not exceed 0.44 pound per ton of asphalt processed. This will limit the potential to emit PM from the entire source to less than 250 tons per year. Thus, the requirements of 326 IAC 2-2, PSD, are not applicable
- (b) Pursuant to 40 CFR 60.92 and 326 IAC 12-1, the opacity of emissions from the aggregate dryer/mixer stack (S_1) shall be less than twenty percent (20%).
- (c) Pursuant to 40 CFR 60.92 and 326 IAC 12-1, the PM emissions from the aggregate dryer/mixer shall not exceed 90 milligrams per dry standard cubic meter (0.04 grains per dry standard cubic foot).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for aggregate dryer and drum mixer and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11][40 CFR 60.93][326 IAC 12]

- (a) On or before July 26, 2012, in order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM and PM₁₀ testing of the aggregate dryer/mixer utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Pursuant to 40 CFR 60.93, compliance with the PM standards in 40 CFR 60.92 shall be determined by using Method 5 to determine particulate concentration and Method 9 to determine opacity. When determining the particulate concentration, the sampling time and sampling volume for each run shall be at least 60 minutes and 0.90 dry standard cubic meter (31.8 dry standard cubic feet).

D.1.6 Particulate Matter (PM and PM₁₀)

In order to comply with Conditions D.1.3 and D.1.4, the baghouse for the aggregate dryer/mixer shall be in operation and control emissions from the aggregate dryer/mixer at all times when the aggregate dryer/mixer is in operation.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the conveyors, material transfer points and aggregate dryer/mixer stack (S_1) exhaust shall be performed once per day during normal daylight operations when. 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, eight 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 the would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the aggregate dryer and drum mixer, at least once per day when the aggregate dryer and drum mixer are in operation. When, for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 8.0 inches of water, in accordance with First Administrative Amendment 003-20617-00293 issued March 14, 2005, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall record the inlet temperature to the baghouse used in conjunction with the aggregate dryer and drum mixer at least once per day when the aggregate dryer and drum mixer are in operation when venting to the atmosphere. When, for any one reading, the inlet temperature to the baghouse is outside the normal range of 200 to 400 degrees Fahrenheit or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. This is required to prevent overheating of the bags and to prevent low temperatures from mudding up the bags. This temperature range is excluded only when cold mix is being produced. A temperature reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (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).

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

D.1.10 Record Keeping Requirement

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain monthly records the amount and VOC content of each solvent used for emulsified asphalt. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the conveyors, material transfer points and aggregate dryer and drum mixer stack (S₁) exhaust once per day.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
 - (1) Records of the pressure drop once per day.
 - (2) Records of the inlet temperature once per day.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (b) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (c) Covered conveyers for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (d) One (1) natural gas-fired hot oil heater, with a capacity of 0.6 million British thermal units per hour.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the natural gas-fired hot oil heater shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where Pt = PM emission rate limit (lbs/MMBtu)
 Q = total source heat input capacity (MMBtu/hr)

The total source heat input capacity is 0.6 MMBtu/hr. Therefore, the PM emission limit for the natural gas-fired hot oil heater is calculated as follows:

$$Pt = 1.09/0.6^{0.26} = 1.24 \text{ lbs/MMBtu}$$

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

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

Source Name: City of Fort Wayne Street Department
Source Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
Mailing Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
FESOP Permit No.: F003-24296-00293

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: City of Fort Wayne Street Department
Source Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
Mailing Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
FESOP Permit No.: F003-24296-00293

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Usage Report (Submit Report Quarterly)

Use this form only if one (1) type of binder is used, or no binder is used in the past 12 months

Source Name: City of Fort Wayne Street Department
 Source Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 Mailing Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 FESOP Permit No.: F003-24296-00293
 Facility: Asphalt Plant (cold mix asphalt production)
 Parameter: VOC solvent usage per twelve (12) consecutive month period, with compliance determined at the end of each month
 Limit: Cutback asphalt rapid cure liquid binder, less than 99.0 tons VOC solvent usage
 Cutback asphalt medium cure liquid binder, less than 134 tons VOC solvent usage
 Cutback asphalt slow cure liquid binder, less than 376 tons VOC solvent usage
 Emulsified asphalt with solvent liquid binder usage, less than 205 tons VOC solvent usage
 Other asphalt with solvent liquid binder, less than 3,762 tons VOC solvent usage
 Equivalent to VOC emissions of less than 99.0 tons per twelve (12) consecutive month period, excluding combustion

Year: _____ **Type of Binder:** _____

Month	VOC Solvent Usage (tons)	VOC Solvent Usage (tons)	VOC Solvent Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: City of Fort Wayne Street Department
 Source Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 Mailing Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 FESOP Permit No.: F003-24296-00293
 Facility: Asphalt Plant (cold mix asphalt production)
 Parameter: VOC emissions; excluding combustion, based on solvent usage
 Limit: Less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, using the following equation:

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment Ratio}} = \text{tons of VOC emitted}$$

YEAR: _____

Month	Type of Liquid Binder	VOC Solvent Usage this Month (tons)	Adjustment Ratio	VOC emitted from each binder This Month (tons)	VOC emitted from all binders This Month (tons)	VOC emitted Previous 11 Months (tons)	VOC emitted 12 Month Total (tons)
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				

No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____
 Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: City of Fort Wayne Street Department
 Source Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 Mailing Address: 1701 South Lafayette St., Fort Wayne, Indiana 46803
 FESOP Permit No.: F003-24296-00293

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	City of Fort Wayne Street Department
Source Location:	1701 South Lafayette Street, Fort Wayne, IN 46803
County:	Allen
SIC Code:	2951 and 9199
Permit Renewal No.:	F003-24296-00293
Permit Reviewer:	Anne-Marie C. Hart

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from City of Fort Wayne Street Department relating to the operation of a drum mix asphalt plant.

History

On February 7, 2007, City of Fort Wayne Street Department submitted applications to the OAQ requesting to renew its operating permit F003-24296-00293. City of Fort Wayne Street Department was issued a FESOP Renewal on November 6, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) drum mixer, identified as SJG#4200, with a maximum capacity of 120 tons of asphalt per hour, using Baghouse, identified as BC1 as control constructed 1999, and exhausting to stack S₁.
- (b) One (1) natural gas-fired drum dryer, constructed in 1999, exhausting through Baghouse, identified as BC1, and Stack S₁, rated at thirty-seven (37) million British thermal units per hour.
- (c) One (1) 56 foot drag conveyor, identified as DC₁, constructed in 1999.
- (d) Four (4) cold feed bins, collectively identified as CFB₁, constructed in 1999, with a capacity of 118.75 tons of wet aggregate per hour, total.
- (e) Four (4) aggregate bins used to store limestone, identified as #9, #11, #12 and #13, constructed in 1999, with a capacity of 8,925 cubic feet, each.
- (f) Two (2) asphalt storage tanks, identified as AT₁ and AT₂, constructed in 1975, with a capacity of 8,000 gallons and 20,000 gallons, respectively.
- (g) One (1) asphalt emulsion storage tank, identified as AE₁, constructed in 1985 with a capacity of 8,000 gallons.
- (h) One (1) dust storage bin, exhausting back to the drum mixer, constructed in 1999.

Insignificant Activities

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

- (a) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (b) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (c) Covered conveyers for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (d) One (1) natural gas-fired hot oil heater, with a capacity of 0.6 million British thermal units per hour [326 IAC 6-2].

Existing Approvals

Since the issuance of the FESOP (003-10047-00293) on January 15, 1999, the source has constructed or has been operating under the following approvals as well:

- (a) FESOP renewal No. 003-16858-00293 issued on November 6, 2003; and
- (b) Administrative Amendment No. 003-20617-00293 issued on March 14, 2005.

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

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S ₁	asphalt drum mixer	35	3' 2"	20,000	270

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Allen County

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Allen County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Allen County has been classified as attainment or unclassifiable in Indiana for SO2, NOx, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	14,731
PM-10	3,422
SO ₂	1.89
VOC	17.73
CO	82.15
NO _x	30.13

HAPs	tons/year
Antimony	9.46 E-05
Arsenic	2.94 E-04
Benzene	2.05 E-01
Cadmium	3.93 E-04
Chromium	3.11 E-03
Cobalt	1.37 E-05
Dichlorobenzene	1.94 E-04
Formaldehyde	1.64 E+00
Hexane	7.75 E-01
Lead	4.07 E-04
Manganese	4.11 E-03
Mercury	1.26 E-04
Methyl Chloroform	2.52 E-02
Nickel	3.34 E-02

HAPs	tons/year
Selenium	1.84 E-04
2, 2, 4 Trimethylpentane	2.10 E-02
Toluene	7.93 E-02
Total PAH HAPs	9.99 E-02
Xylene	1.05 E-01
Total	3.13

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM 10 and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM10 and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Fugitive Emissions

This type of operation is not one of the twenty-eight (28) listed source categories under, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Natural Gas-fired Drum Dryer	0.3	1.2	0.1	0.9	13.6	16.2	.306
Cutback and Emulsified Asphalt	0.00	0.00	0.00	99	0.00	0.00	0.00
Drum Mixer	17.34	1.21	Negl.	Negl.	Negl.	Negl.	Negl.
Conveying/Handling	1.05	0.53	-	-	-	-	-
Screening	13.1	4.57	-	-	-	-	-
Storage	0.151	Negligible	-	-	-	-	-
Insignificant Activities	Negl.	Negligible	Negl.	Negl.	0.221	0.263	Negl.
Total Emissions	31.95	7.58	0.10	< 100	13.82	16.46	0.312

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) The drum mix asphalt plant, constructed in 1999, is subject to the New Source Performance Standard for Hot Mix Asphalt Facilities (40 CFR 60.90, Subpart I), which is incorporated by reference as 326 IAC 12. This source was constructed after June 11, 1973.

Nonapplicable portions of the NSPS will not be included in the permit. This source is subject to the following portions of Subpart I:

- (1) 40 CFR 60.91(a)
 - (2) 40 CFR 60.92(a)(1)
 - (3) 40 CFR 60.92(a)(2)
 - (4) 40 CFR 60.93(a)
 - (5) 40 CFR 60.93(b)(1)
 - (6) 40 CFR 60.93(b)(2)
- (b) The one (1) asphalt emulsion storage tank, constructed after July 23, 1984, is not subject to NSPS, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) because it has a capacity less than forty (40) cubic meters.
 - (c) The two (2) asphalt storage tanks, constructed in 1975, are not subject to the NSPS, 326 IAC 12, (40 CFR Part 60,110, Subpart K) because the tanks have capacities less than 40,000 gallons (151.40 m³).
 - (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

- (a) This source, which is not one of the twenty-eight (28) listed source categories, was initially constructed prior to August 7, 1977, and has since been modified with additional sources pursuant to FESOP F003-10047-00293. The unrestricted potential to emit PM from the total of all facilities at this source, other than the aggregate dryer/mixer is 14.30 tons per year. The potential to emit PM from the aggregate dryer/mixer shall not exceed 0.44 pound per ton of asphalt processed, equivalent to less than 235.7 tons per year while operating at a maximum rate of 120 tons of asphalt per hour for every hour of the year (0.44 lb/ton x 120 tons/hr x 8760 hrs/yr / 2,000 lbs/ton < 235.7 tons per year). This will result in PM emissions from the entire source of less than 250 tons per year. The potential to emit PM after control is 17.34 tons per year from the aggregate dryer/mixer. Therefore, the aggregate dryer/mixer will comply with this limitation and the source will

remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. Operation of the baghouse is required at all times to ensure compliance with this limit.

- (b) The unrestricted potential to emit PM₁₀ from all facilities at this source, other than the aggregate dryer/mixer is 6.37 tons per year. The potential to emit PM₁₀ from the aggregate dryer/mixer shall not exceed 0.17 pounds per ton of asphalt processed, equivalent to less than 93.63 tons per year while operating at a maximum rate of 120 tons of asphalt per hour for every hour of the year (0.17 lb/ton x 120 tons/hr x 8760 hrs/yr / 2,000 lbs/ton < 93.63 tons per year). This will result in PM₁₀ emissions from the entire source of less than 100 tons per year. The potential to emit PM₁₀ after control is 1.21 tons per year from the aggregate dryer/mixer. Therefore, the aggregate dryer/mixer will comply with this limitation and the source will remain a minor source pursuant to 326 IAC 2-8-4, FESOP. Compliance with that limit will also ensure that this source is a minor source of PM₁₀ pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. Operation of the baghouse is required at all times to ensure compliance with this limit.
- (c) The potential to emit VOC is limited to less than 100 tons per year to comply with 326 IAC 2-8-4, FESOP. Compliance with that limit will also ensure that this source is a minor source of VOC pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

This source was initially constructed prior to December 13, 1985, in Allen County, and received all necessary preconstruction approvals in 1975. This rule applies to sources of fugitive particulate matter emissions located in nonattainment areas for particulate matter as designated by the board. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀ and VOC shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

- (a) The unrestricted potential to emit PM₁₀ from the total of all facilities at this source, other than the aggregate dryer/mixer is 6.37 tons per year. The potential to emit PM₁₀ from the aggregate dryer/mixer shall not exceed 0.17 pound per ton of asphalt processed, equivalent to less than 93.63 tons per twelve (12) month consecutive period, when operating at the maximum rate of 120 tons per hour for every hour of the year (0.17 lb/ton

x 120 tons/hr x 8,760 hr/yr / 2,000 lbs/ton < 93.63 tons/year). This will result in PM₁₀ emissions from the entire source of less than 100 tons per twelve (12) month consecutive period. The potential to emit PM₁₀ from the aggregate dryer/mixer after control by the baghouse is 1.21 tons per twelve (12) month consecutive period. Compliance with this emission limitation is accomplished by using the baghouse as control. Operation of the baghouse is required at all times to ensure compliance with this limit. Thus, the requirements of 326 IAC 2-7, Part 70, do not apply, and this source will be issued a FESOP.

- (b) The unrestricted potential to emit NO_x, SO₂, and CO is less than 100 tons per year. Therefore, no NO_x, SO₂, and CO limit is required to make the requirements of 326 IAC 2-7, Part 70, not applicable.
- (c) The VOC emissions from the use liquied binders in cold mix asphalt production shall be limited to 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall be achieved by limiting the total VOC usage of any selected binder to less than or equal to the stated limit in (c) for that binder during the last twelve (12) months. When more than one binder is used, the formula in (c)(6) must be applied so that the total VOC emitted does not exceed 99.0 tons per twelve (12) consecutive month period.

Liquid binders used in the production of cold mix asphalt shall be defined as follows:

- (1) Cut back asphalt rapid cure, containing a maximum of 25.3% of the liquid binder by weight of VOC solvent and 95% by weight of VOC solvent evaporating.
- (2) Cut back asphalt medium cure, containing a maximum of 28.6% of the liquid binder by weight of VOC solvent and 70% by weight of VOC solvent evaporating.
- (3) Cut back asphalt slow cure, containing a maximum of 20% liquid binder by weight of VOC solvent and 25% by weight of VOC solvent evaporating.
- (4) Emulsified asphalt with solvent, containing a maximum of 15% of liquid binder by weight of VOC solvent and 46.4% by weight of the VOC solvent in the liquid blend evaporating. The percent of oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
- (5) Other asphalt with solvent binder, containing a maximum 25.9% of the liquid binder of VOC solvent and 2.5% by weight of the VOC solvent evaporating.

The liquid binder used in cold mix asphalt production shall be limited as follows:

- (1) Cutback asphalt rapid cure liquid binder usage shall not exceed 99.0 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the month.
- (2) Cutback asphalt medium cure liquid binder usage shall not exceed 134 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the month.
- (3) Cutback asphalt slow cure liquid binder usage shall not exceed 376 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of each month.

- (4) Emulsified asphalt with solvent liquid binder usage shall not exceed 205 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of the each month.
- (5) Other asphalt with solvent liquid binder shall not exceed 3762 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis, with compliance determined at the end of each month.
- (6) When more than one type of binder is used per twelve (12) month consecutive period, the total usage of all binders shall be adjusted to an equivalent amount of rapid cure liquid binder. The total equivalent rapid cure liquid binder usage shall be limited to less than or equal to 82.28 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.

In order to determine the equivalent rapid cure liquid binder usage for each type of binder, use the following formula and divide the tons of VOC solvent used per year for each type of binder by the corresponding adjustment ration listed in the table that follows.

$$\text{Equivalent Rapid Cure Liquid Binder Usage (tons/year)} = \frac{\text{VOC solvent used for each binder (tons/year)}}{\text{Adjustment Ratio}}$$

Type of binder	VOC solvent used (tons/year)	Adjustment Ratio	Equivalent Rapid Cure Liquid Binder Usage (tons/year)
cutback asphalt rapid cure		1	
cutback asphalt medium cure		1.36	
cutback asphalt slow cure		3.8	
emulsified asphalt		2.04	
other asphalt		38	

Compliance with these limits combined with the potential emissions from all other emission units at this source shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-2-4, the natural gas-fired hot oil heater shall be limited by the following equation:

$$P_t = 1.09/Q^{0.26}$$

Where P_t = PM emission rate limit (lbs/MMBtu)
 Q = total source heat input capacity (MMBtu/hr)

The total source heat input capacity is 0.6 MMBtu/hr. Therefore, the PM emission limit for the natural gas-fired hot oil heater is calculated as follows:

$$P_t = 1.09/0.6^{0.26} = 1.24 \text{ lbs/MMBtu}$$

A PM emission limit of 1.24 lbs/MMBtu is equivalent to 0.74 pounds of PM per hour from the natural gas-fired hot oil heater. The natural gas-fired hot oil heater has a potential to emit 0.005 tons of PM per year, equivalent to 0.0011 pounds of PM per hour. The natural gas-fired hot oil heater is able to comply with this limit of 1.24 pounds of PM per MMBtu.

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

The potential to emit PM from this facility is limited by 326 IAC 12, 40 CFR Part 60.90, Subpart I. 326 IAC 12, 40 CFR Part 60.90, Subpart I limits emissions to 0.04 gr/dscf. This limit is equivalent to:

$$\begin{aligned} & 0.04 \text{ gr/dscf} \times 20,000 \text{ acfm} \times (528/460+270) \times (100 - 5\% \text{ moisture}/100) \times 525,600 \text{ min/year} \\ & \times 1 \text{ lb}/7000 \text{ grain} \times 1 \text{ ton}/2000 \text{ lbs} \\ & = 20.64 \text{ tons/year} \end{aligned}$$

The limit of 20.64 tons/year is more stringent than the limit associated with 326 IAC 6-3. 326 IAC 6-3 would limit PM to the following:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour, or thirty (30) tons per hour, shall be accomplished by use of the equation:

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

$$E = 55.0 \times 120^{0.11} - 40$$

$$E = 53.1 \text{ pounds per hour} = 232.6 \text{ tons per year}$$

Therefore, pursuant to 326 IAC 6-3-1(c)(5), the requirements of 326 IAC 6-3 are not applicable because it is subject to the more stringent limit in 40 CFR Part 60.90, Subpart I.

326 IAC 8-1-6 (New facilities; General reduction requirements)

This source is subject to the requirements of 326 IAC 8-5-2, Asphalt Paving rules. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-5-2 (Asphalt Paving Rules)

Pursuant to 326 IAC 8-5-1, the requirements of this rule are applicable to the source because it is a new source, constructed after January 1, 1980, including asphalt paving operations. Pursuant to 326 IAC 8-5-2, the Permittee shall not allow the use of asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion, except as used for the following purposes:

- (a) Penetrating prime coating;
- (b) stockpile storage mix; and
- (c) application during the months of November, December, January, February, and March.

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

Pursuant to 326 IAC 8-9-2(8), the requirements of 326 IAC 8-9 are not applicable to the storage tanks at this source because the source is not located in Clark, Floyd, Lake or Porter County.

326 IAC 12-1 (New Source Performance Standards)

The hot mix asphalt plant is required to comply with the requirements of 40 CFR 60.90, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, as described in the "Federal Rule Applicability" section of this TSD.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 monitoring requirements applicable to this source are as follows:

- (a) Visible emission notations of the conveyors, material transfer points and aggregate dryer/mixer stack (S_1) exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

- (b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the aggregate dryer and drum mixer, at least once per day when the aggregate dryer and drum mixer are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 8.0 inches of water, in accordance with First Administrative Amendment 003-20617-00293 issued March 14, 2005, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C -Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.
- (c) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (d) 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).
- (e) The Permittee shall record the inlet temperature to the baghouse used in conjunction with the aggregate dryer and drum mixer, at least once per day when the aggregate dryer and drum mixer are in operation. When for any one reading, the inlet temperature to the baghouse is outside the normal range of 200 and 400 degrees Fahrenheit or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. This is required to prevent overheating of the bags and to prevent low temperatures from mudding up the bags. This temperature range is excluded only when cold mix is being produced. A temperature reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the baghouse for the dryer and mixer must operate properly to ensure compliance with 40 CFR 60 Subpart I, and 326 IAC 2-8 (FESOP), and to make the requirements of 326 IAC 2-2 (PSD) not applicable.

Testing Requirements

- (a) On or before October 11, 2007, in order to demonstrate compliance with Conditions D.1.3 and D.1.4, the Permittee shall perform PM and PM₁₀ testing of the aggregate dryer/mixer utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Pursuant to 40 CFR 60.93, compliance with the PM standards in 40 CFR 60.92 shall be determined by using Method 5 to determine particulate concentration and Method 9 to

determine opacity. When determining the particulate concentration, the sampling time and sampling volume for each run shall be at least 60 minutes and 0.90 dry standard cubic meter (31.8 dry standard cubic feet).

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 7, 2007.

Conclusion

The operation of this drum mix asphalt plant shall be subject to the conditions of the attached FESOP No. F003-24296-00293.

Appendix A: Emission Calculations
Total Potential Emissions Summary
Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

Activity	All emissions in (ton/year)						
	PM	PM 10	SOx	NOx	VOC	CO	HAPs
Natural Gas-fired Drum Dryer	0.30	1.20	0.10	16.20	0.90	13.60	3.06E-01
Cutback and Emulsified Asphalt	0.00	0.00	0.00	0.00	less than 99	0.00	0.00E+00
Drum Mixer*	14,716.80	3,416.40	1.787	13.67	16.82	68.33	2.82E+00
Conveying/Handling	1.05	0.53	0.00	0.00	0.00	0.00	0.00E+00
Screening	13.1	4.57	0.00	0.00	0.00	0.00	0.00E+00
Storage	0.151	0.053	0.00	0.00	0.00	0.00	0.00E+00
Insignificant Activities	0.005	0.02	0.002	0.263	0.014	0.221	4.96E-03
Total Emissions	14731.41	3422.77	1.89	30.13	17.73	82.15	3.13E+00
Controlled Emissions							
Drum Mixer	17.34	1.21	0.00003	0.00026	0.00032	0.001	5.36E-05
Total Emissions **	31.95	7.58	0.10	16.46	less than 100.00	13.82	3.11E-01

* Uncontrolled Emissions

** Emissions from Natural Gas-fired Drum Dryer, Conveying/Handling, Screening, Storage and Controlled Drum Mixer

Natural Gas Combustion Only
MM BTU/HR <100
Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

37.0

324.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.3	1.2	0.1	16.2	0.9	13.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

**Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.89E-05	2.22E-05	1.39E-03	3.33E-02	6.29E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.25E-06	2.04E-05	2.59E-05	7.03E-06	3.89E-05
				Total HAPs:	3.49E-02

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Aggregate Drying: Drum-Mix Plant
Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

Maximum Throughput: 120 ton/hour
Baghouse Efficiency: 99.00%

Criteria Pollutant	Emission Factor	Potential Emissions	Controlled Potential
PM	28	14716.8	17.34
PM 10	6.5	3416.4	1.21
SO ₂	0.0034	1.787	0.00003
NO _x	0.026	13.67	0.00026
VOC	0.032	16.82	0.00032
CO	0.13	68.33	0.001
Hazardous Air Pollutants			
Antimony	1.80E-07	9.46E-05	1.80E-09
Arsenic	5.60E-07	2.94E-04	5.60E-09
Cadmium	4.10E-07	2.15E-04	4.10E-09
Chromium	5.50E-06	2.89E-03	5.50E-08
Cobalt	2.60E-08	1.37E-05	2.60E-10
Lead	6.20E-07	3.26E-04	6.20E-09
Manganese	7.70E-06	4.05E-03	7.70E-08
Mercury	2.40E-07	1.26E-04	2.40E-09
Nickel	6.30E-05	3.31E-02	6.30E-07
Selenium	3.50E-07	1.84E-04	3.50E-09
2, 2, 4 Trimethylpentane	4.00E-05	2.10E-02	4.00E-07
Benzene	3.90E-04	2.05E-01	3.90E-06
Ethylbenzene	2.40E-04	1.26E-01	2.40E-06
Formaldehyde	3.10E-03	1.63E+00	3.10E-05
Hexane	9.20E-04	4.84E-01	9.20E-06
Methyl Chloroform	4.80E-05	2.52E-02	4.80E-07
Toluene	1.50E-04	7.88E-02	1.50E-06
Total PAH HAPs	1.90E-04	9.99E-02	1.90E-06
Xylene	2.00E-04	1.05E-01	2.00E-06
Total HAPs		2.82E+00	5.36E-05

Methodology

Emission Factors from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-3, 11.1-7, 11.1-8, 11.1-10, 11.1-1:

Potential to Emit (ton/year) = Emission Factor (lb/ton) x Maximum Throughput (ton/hour) x 8760 (hour/year) x 1/2000 (lb/ton)

* PM and PM10 Emission Factor of 0.033 and 0.023, respectively from AP-42 Chapter 11.1, Table 11.1

Conveying / Handling
Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

The following calculations determine the amount of emissions created by material handling of aggregate, based on 8760 hours of use and AP-42, Ch. 13.2.4

$$E_f \text{ PM} = 0.0032 \times \frac{(U/5)^{1.3}}{(M/2)^{1.4}} \times k = 0.002 \text{ lbs/ton}$$

k = .74 (particle size multiplier)
 U = 12 mph mean wind speed (worst case)
 M = 5.0% moisture

$$E_f \text{ PM}_{10} = 0.0032 \times \frac{(U/5)^{1.3}}{(M/2)^{1.4}} \times k = 0.001 \text{ lbs/ton}$$

k = .35 (particle size multiplier)
 U = 12 mph mean wind speed (worst case)
 M = 5.0% moisture

$$\text{PM: } 0.002 \text{ lbs/ton} \times \frac{120 \text{ tons/hour} \times 8760 \text{ hours/year}}{2000 \text{ lbs/ton}} = 1.05 \text{ tons/year}$$

$$\text{PM}_{10}: 0.001 \text{ lbs/ton} \times \frac{120 \text{ tons/hour} \times 8760 \text{ hours/year}}{2000 \text{ lbs/ton}} = 0.53 \text{ tons/year}$$

Screening

Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, Indiana 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

Maximum Capacity: 120 tons/hour

PM Emissions factor: 0.025 lbs/ton
PM 10 Emissions factor: 0.0087 lbs/ton

$$\text{PM: } \frac{120 \text{ tons/hour} \times 0.025 \text{ lbs/ton}}{2000 \text{ lbs/ton}} \times 8760 \text{ hours/year} = 13.14 \text{ tons/year}$$

$$\text{PM 10: } \frac{120 \text{ tons/hour} \times 0.0087 \text{ lbs/ton}}{2000 \text{ lbs/ton}} \times 8760 \text{ hours/year} = 4.57 \text{ tons/year}$$

Methodology

Screening emissions factors from AP-42, Ch. 11.19.2, Table 11.19.2-2

Storage

Company Name: City of Fort Wayne Street Department
Address City IN Zip: 1701 South Lafayette Street, Fort Wayne, IN 46803
Permit #: F003-24296-00293
Reviewer: Anne-Marie C. Hart
Date: August 8, 2007

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8760 hours of use and (pre-1983) AP-42, Ch. 11.2.3

$$\begin{aligned} E_f &= 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15) \\ &= 1.74 \text{ lbs/acre/day for sand} \\ &= 1.16 \text{ lbs/acre/day for stone} \end{aligned}$$

where

$$\begin{aligned} s &= 1.5 \% \text{ silt for sand} \\ s &= 1.0 \% \text{ silt for stone} \\ p &= 125 \text{ days of rain greater than or equal to 0.01 inches} \\ f &= 15 \% \text{ of wind greater than or equal to 12 mph} \end{aligned}$$

$$E_p (\text{storage}) = \frac{E_f \cdot sc \cdot (20 \text{ cuft/ton}) \cdot (365/\text{day/year})}{(2000 \text{ lbs/ton}) \cdot (43560 \text{ sqft/acre}) \cdot (25 \text{ ft})}$$

$$\begin{aligned} &= 0.140 \text{ ton/year for sand} \\ &= 0.012 \text{ ton/year for stone} \end{aligned}$$

$$\text{Total PM} = 0.151 \text{ tons/year}$$

where

$$\begin{aligned} sc &= 24,000 \text{ tons storage capacity for sand} \\ sc &= 3,000 \text{ tons storage capacity for stone} \end{aligned}$$

$$\begin{aligned} \text{PM}_{10} &= 35\% \text{ of PM} &= 0.049 \text{ tons/year for sand} \\ & &= 0.004 \text{ tons/year for sand} \\ \text{Total PM}_{10} &= &= 0.053 \text{ tons/year} \end{aligned}$$

Natural Gas Combustion Only
MM BTU/HR <100
Hot Oil Heater on Gas Insignificant Activity
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Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.6

5.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.005	0.020	0.002	0.263	0.014	0.221

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Hot Oil Heater on Gas Insignificant Activity
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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 Emission in tons/yr	5.519E-06	3.154E-06	1.971E-04	4.730E-03	8.935E-06

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 Emission in tons/yr	1.314E-06	2.891E-06	3.679E-06	9.986E-07	5.519E-06
				Total HAPs	4.960E-03

Methodology is the same as page

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.