



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 16, 2008

RE: Milestone Contractors, L.P. / 005-24413-00052

FROM: Matthew Stuckey, Branch 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.
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Thomas W. Easterly
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100 North Senate Avenue
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Milestone Contractors, L.P.
5245 North Indianapolis Road
Columbus, Indiana 47201**

(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.: F005-24413-00052	
Issued by: Original signed by Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 16, 2008 Expiration Date: April 16, 2018

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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 pavement production plant.

Source Address:	5245 North Indianapolis Road, Columbus, IN 47201
Mailing Address:	5950 South Belmont Avenue, Indianapolis, IN 46217
General Source Phone Number:	317-788-6885
SIC Code:	2951
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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) aggregate counter-flow drum mixer, identified as emission unit No. 2, with a maximum capacity of 450 tons per hour, equipped with one (1) natural gas-fired aggregate dryer/burner with a maximum rated capacity of 135 million British thermal units (MMBtu) per hour, using No. 2 fuel oil and re-refined waste oil as back-up fuels, using one (1) baghouse with a primary dust collector as control, constructed in 1992, and exhausting at one (1) stack, identified as S-1;
- (b) one (1) draglat conveyor, two (2) feed conveyors, and one (1) screen; and
- (c) cold mix (stockpile mix) asphalt storage piles.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

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) one (1) re-refined waste oil storage tank, identified as Tank 22, constructed in 2000, with a maximum storage capacity of 21,000 gallons, exhausting at one (1) stack;
- (b) one (1) distillate No. 2 fuel oil-fired liquid asphalt tank heater, identified as emission unit No. 13, rated at 1.3 MMBtu per hour, exhausting at one (1) stack, identified as S-2A;
- (c) two (2) No. 2 fuel oil-fired liquid asphalt tank heaters, identified as emission units No. 15 and No. 17, rated at 0.45 and 1.86 MMBtu per hour, respectively, with the emissions from unit No. 15 exhausted through two (2) stacks, identified as S-4A and S-4B, and the emissions from unit No. 17 exhausted through two (2) stacks, identified as S-6A, and S-6B;

- (d) two (2) liquid asphalt storage tanks, identified as Tank 12 and Tank 14, each constructed in 1974, each with a maximum storage capacity of 26,000 gallons;
- (e) two (2) liquid asphalt storage tanks, identified as Tank 16 and Tank 17, each constructed in 2003, each with a maximum storage capacity of 20,000 gallons;
- (f) aggregate storage piles;
- (g) five (5) hot mix asphalt cement storage silos, each with a maximum storage capacity of 300 tons;
- (h) one (1) cold feed bin consisting of eight (8) compartments;
- (i) VOC and HAP storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons;
- (j) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (k) a laboratory as defined in 326 IAC 2-7-1(21)(D);
- (l) one (1) natural gas-fired space heater rated at 0.1 MMBtu per hour located in the laboratory;
- (m) combustion source flame safety purging on startup;
- (n) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (o) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or; having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (p) closed loop heating and cooling systems;
- (q) paved and unpaved roads and parking lots with public access [326 IAC 6-5]; and
- (r) two (2) RAP feed bins with two (2) feed conveyors.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

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, F005-24413-00052, is issued for a fixed term of ten (10) 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 Section 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 F005-24413-00052 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
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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 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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 18, 1996. The plan is included as Attachment A.

C.8 Stack Height [326 IAC 1-7]

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

C.9 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.10 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.11 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.12 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.13 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.14 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.15 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

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

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

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

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 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.17 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.18 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.19 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.20 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.21 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 EMISSION UNIT OPERATION CONDITIONS

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

- (a) one (1) aggregate counter-flow drum mixer, identified as emission unit No. 2, with a maximum capacity of 450 tons per hour, equipped with one (1) natural gas-fired aggregate dryer/burner with a maximum rated capacity of 135 million British thermal units (MMBtu) per hour, using No. 2 fuel oil and re-refined waste oil as back-up fuels, using one (1) baghouse with a primary dust collector as control, constructed in 1992, and exhausting at one (1) stack, identified as S-1;
- (b) one (1) drag-slat conveyor, two (2) feed conveyors, and one (1) screen.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

Pursuant to 40 CFR 60, Subpart I, the Permittee shall comply with the provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the aggregate dryer/burner in accordance with the schedule in 40 CFR 60, Subpart A.

D.1.2 NSPS, Requirements [40 CFR 60, Subpart I][326 IAC 12-1]

Pursuant to CFR Part 60, Subpart I, the Permittee shall comply with the provisions of this rule, which are incorporated by reference as 326 IAC 12-1, for the aggregate dryer/burner as specified as follows:

§ 60.90 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each hot mix asphalt facility. For the purpose of this subpart, a hot mix asphalt facility is comprised only of any combination of the following: dryers; systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler, systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems.

(b) Any facility under paragraph (a) of this section that commences construction or modification after June 11, 1973, is subject to the requirements of this subpart.

§ 60.91 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Hot mix asphalt facility* means any facility, as described in §60.90, used to manufacture hot mix asphalt by heating and drying aggregate and mixing with asphalt cements.

§ 60.92 Standard for particulate matter.

(a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any affected facility any gases which:

- (1) Contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf).
- (2) Exhibit 20 percent opacity, or greater.

§ 60.93 Test methods and procedures.

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.92 as follows:

- (1) Method 5 shall be used to determine the particulate matter concentration. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).
- (2) Method 9 and the procedures in §60.11 shall be used to determine opacity.

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

D.1.3 PSD Minor Limit [326 IAC 2-2]

Particulate matter (PM) emissions from the aggregate dryer/burner shall not exceed 0.096 pound of PM per ton of hot mix asphalt produced based on a maximum throughput of 450 tons of asphalt mix per hour.

This limits total source-wide PM emissions to less than 250 tons per twelve (12) consecutive month period. Therefore, compliance with this limit will render the requirements of 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 2-8-4, PM₁₀ emissions from the aggregate dryer/burner shall not exceed 0.042 pound of PM₁₀ per ton of hot mix asphalt produced based on a maximum throughput of 450 tons of asphalt mix per hour.

This limits the source-wide potential to emit PM₁₀ to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations):

- (a) Sulfur dioxide emissions from the aggregate dryer/burner shall be limited to five-tenths (0.5) pound per MMBtu when combusting distillate oil. In order to comply with this limit, the sulfur content of the No. 2 fuel oil combusted in this unit shall not exceed 0.44%.
- (b) In addition, sulfur dioxide emissions from the aggregate dryer/burner shall be limited to one and six-tenths (1.6) pounds per MMBtu when combusting residual oil. In order to comply with this limit, the sulfur content of the re-refined waste oil combusted in this unit shall not exceed 0.75%.

D.1.6 Natural Gas Usage [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4(1), the input of natural gas to the 135 MMBtu per hour burner for the aggregate dryer/burner shall be limited to 662.13 million cubic feet (MMcf) per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes

of determining compliance, the following shall apply:

- (a) every kilogallon of No. 2 fuel oil burned in the aggregate dryer/burner shall be equivalent to 0.0857 MMcf of natural gas, based on NO_x emissions, such that the total MMcf of natural gas and natural gas equivalent input does not exceed the limit specified;
- (b) every kilogallon of re-refined waste oil burned in the aggregate dryer/burner shall be equivalent to 0.0679 MMcf of natural gas, based on NO_x emissions, such that the total MMcf of natural gas and natural gas equivalent input does not exceed the limit specified.

This limits the source-wide potential to emit NO_x to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

D.1.7 Re-refined Waste Oil Usage [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4(1), the input of re-refined waste oil to the aggregate dryer/burner shall be limited to 1033.33 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The sulfur content of the re-refined waste oil used in this emission unit shall not exceed 0.75% and the chlorine content shall not exceed 0.2%. For purposes of determining compliance, the following shall apply:

- (a) every kilogallon of No. 2 fuel oil burned in the aggregate dryer/burner shall be equivalent to 0.63 kilogallon of re-refined waste oil, based on SO₂ emissions and a maximum sulfur content of 0.44%, such that the total gallons of re-refined waste oil and re-refined waste oil equivalent input does not exceed the limit specified;
- (b) every MMcf of natural gas burned in the aggregate dryer/burner shall be equivalent to 0.005 kilogallons of re-refined waste oil, based on SO₂ emissions, such that the total gallons of re-refined waste oil and re-refined waste oil equivalent input does not exceed the limit specified.

This limits the source-wide potential to emit SO₂ to less than 100 tons per twelve (12) consecutive month period, HCl emissions to less than 10 tons per twelve (12) consecutive month period, and emissions of the combination of HAPs to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

D.1.8 No. 2 Fuel Oil Usage [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4(1), the input of No. 2 fuel oil to the aggregate dryer/burner shall be limited to 2518.27 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The sulfur content of the No. 2 fuel oil used in this emission unit shall not exceed 0.44%. For purposes of determining compliance, the following shall apply:

- (a) every kilogallon of re-refined waste oil burned in the aggregate dryer/burner shall be equivalent to 1.60 kilogallons of No. 2 fuel oil, based on SO₂ emissions, a maximum waste oil sulfur content of 0.75%, and a maximum fuel oil sulfur content of 0.44%, such that the total gallons of No. 2 fuel oil and No. 2 fuel oil equivalent input does not exceed the limit specified;
- (b) every MMcf of natural gas burned in the aggregate dryer/burner shall be equivalent to 0.009 kilogallons of No. 2 fuel oil, based on SO₂ emissions, such that the total gallons of No. 2 fuel oil and No. 2 fuel oil equivalent input does not exceed the limit specified.

This limits the source-wide potential to emit SO₂ to less than 100 tons per twelve (12) consecutive

month period. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP) and will render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

D.1.9 Preventive Maintenance [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-8-4(3)]

The Permittee shall perform PM and PM₁₀ stack testing utilizing methods as approved by the Commissioner to document compliance with Conditions D.1.3 and D.1.4. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. PM₁₀ includes filterable and condensable particulate matter. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.11 Sulfur Dioxide Emissions, Sulfur Content, and Chlorine Content

(a) The Permittee shall demonstrate that the chlorine content of the re-refined waste oil does not exceed 0.2% by providing vendor analysis of fuel delivered, accompanied by a vendor certification.

Compliance for sulfur dioxide shall be determined utilizing one of the following options.

(b) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pound per MMBtu heat input for No. 2 fuel oil combustion and one and six-tenths (1.6) pounds per MMBtu heat input for re-refined waste oil combustion by:

(1) providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or

(2) analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 135 MMBtu per hour aggregate dryer/burner, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

D.1.12 Particulate Matter (PM/PM₁₀)

In order to comply with Conditions D.1.3 and D.1.4, the baghouse with a primary dust collector for PM/PM₁₀ control shall be in operation and control emissions from the aggregate dryer/burner at all times that this emission unit is in operation.

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

D.1.13 Visible Emissions Notations

- (a) Visible emission notations of the conveyors, transfer points, and the aggregate mixing and drying operation stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response 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.1.14 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the aggregate dryer/burner at least once per day when the aggregate dryer/burner is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.1.15 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 emission unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5, D.1.6, D.1.7, and D.1.8, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) below shall be complete and sufficient to establish compliance with the SO₂ emission limits established in Conditions D.1.5 and D.1.7, and D.1.8, the HCl emission limit established in Condition D.1.7, and the NO_x emission limit established in Condition D.1.6.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual natural gas and natural gas equivalent usage per month since last compliance determination period and equivalent NO_x emissions;
 - (3) Actual waste oil and waste oil equivalent usage per month since last compliance determination period and equivalent SO₂ and HCl emissions;
 - (4) Actual No. 2 fuel oil and No. 2 fuel oil equivalent usage per month since last compliance determination period and equivalent SO₂ emissions;
 - (5) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum shall be maintained:

- (6) fuel supplier certifications;
- (7) the name of the fuel supplier; and
- (8) a statement from the fuel supplier that certifies the sulfur content of the No. 2 fuel oil, and the chlorine content and sulfur content of the waste oil.

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

- (b) The Permittee shall maintain records sufficient to verify compliance with the procedures specified in condition D.1.11(a), D.1.11(b), and D.1.11(c) if applicable. Records shall be maintained for a period of five (5) years and shall be made available upon request by IDEM.
- (c) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the conveyors, transfer points, and the aggregate mixing and drying operation stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of the pressure drop readings across the baghouse with a primary dust collector controlling the aggregate dryer/burner. The Permittee shall include in its daily record when a

pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.5, D.1.6, D.1.7, and D.1.8 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

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

(c) cold mix (stockpile mix) asphalt storage piles.

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

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

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

(a) Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving Rules), the use of cutback asphalt or asphalt emulsion shall not contain more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

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

(b) Gelled asphalt with VOC solvent liquid binder used in the production of cold mix asphalt shall not exceed 3062 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from cold mix asphalt shall be limited to less than 76.54 tons per twelve (12) consecutive month period, based on the following definition:

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.

Compliance with this limit will restrict source-wide VOC emissions to less than 100 tons per twelve (12) consecutive month period and therefore render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

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

D.2.2 Record Keeping Requirements

To document compliance with Condition D.2.1(b), the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1(b).

- (a) Calendar dates covered in the compliance determination period.
- (b) Gelled asphalt binder usage per month since the last compliance determination period.
- (c) VOC solvent content by weight of the gelled asphalt binder used each month.
- (d) Amount of VOC solvent used in the production of cold mix asphalt, and the amount of VOCs emitted each month.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Milestone Contractors, L.P.
Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
FESOP Permit No.: F005-24413-00052

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: Milestone Contractors, L.P.
Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
FESOP Permit No.: F005-24413-00052

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Milestone Contractors, L.P.
 Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
 Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
 FESOP Permit No.: F005-24413-00052
 Facility: aggregate dryer/burner
 Parameter: natural gas and equivalent usage limit to limit NO_x emissions
 Limit: The usage of natural gas and natural gas equivalents in the 135 MMBtu per hour aggregate dryer/burner shall be limited to 662.14 million cubic feet (MMcf) per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes of determining compliance with this limit, the fuel equivalency ratios in condition D.1.6 shall be used such that the total MMcf of natural gas and natural gas equivalents input does not exceed the limit specified.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Natural Gas and Equivalent Usage This Month (MMcf)	Natural Gas and Equivalent Usage Previous 11 Months (MMcf)	Natural gas and Equivalent Usage 12 Month Total (MMcf)
Month 1			
Month 2			
Month 3			

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

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

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: Milestone Contractors, L.P.
 Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
 Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
 FESOP Permit No.: F005-24413-00052
 Facility: aggregate dryer/burner
 Parameter: re-refined waste oil and equivalent usage limit to limit SO₂ and HCl emissions
 Limit: The usage of re-refined waste oil and re-refined waste oil equivalents in the 135 MMBtu per hour aggregate dryer/burner shall be limited to 1033.33 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes of determining compliance with this limit, the fuel equivalency ratios in condition D.1.7 shall be used such that the total gallons of re-refined waste oil and re-refined waste oil equivalents input does not exceed the limit specified.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Re-refined Waste Oil and Equivalent Usage This Month (kilogallons)	Re-refined Waste Oil and Equivalent Usage Previous 11 Months (kilogallons)	Re-refined Waste Oil and Equivalent Usage 12 Month Total (kilogallons)
Month 1			
Month 2			
Month 3			

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

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

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: Milestone Contractors, L.P.
 Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
 Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
 FESOP Permit No.: F005-24413-00052
 Facility: aggregate dryer/burner
 Parameter: No. 2 fuel oil and equivalent usage limit to limit SO₂ emissions
 Limit: The usage of No. 2 fuel oil and No. 2 fuel oil equivalents in the 135 MMBtu per hour aggregate dryer/burner shall be limited to 2518.27 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. For purposes of determining compliance with this limit, the fuel equivalency ratios in condition D.1.8 shall be used such that the total gallons of No. 2 fuel oil and No. 2 fuel oil equivalents input does not exceed the limit specified.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	No. 2 Fuel Oil and Equivalent Usage This Month (kilogallons)	No. 2 Fuel Oil and Equivalent Usage Previous 11 Months (kilogallons)	No. 2 Fuel Oil and Equivalent Usage 12 Month Total (kilogallons)
Month 1			
Month 2			
Month 3			

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

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

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: Milestone Contractors, L.P.
Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
FESOP Permit No.: F005-24413-00052
Facility: cold mix (stockpile mix) asphalt storage piles
Parameter: VOC solvent usage
Limit: Gelled asphalt with VOC solvent liquid binder used in the production of cold mix asphalt shall not exceed 3062 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Solvent Usage This Month (tons)	Total VOC Solvent Usage Previous 11 Months (tons)	VOC Solvent Usage 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

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: Milestone Contractors, L.P.
 Source Address: 5245 North Indianapolis Road, Columbus, IN 47201
 Mailing Address: 5950 South Belmont Avenue, Indianapolis, IN 46217
 FESOP Permit No.: F005-24413-00052

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

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 <input type="checkbox"/> No deviations occurred this reporting period.	
<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: _____

A certification is not required for this report.

ATTACHMENT A

ASPHALT PLANT SITE FUGITIVE DUST CONTROL PLAN

Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:

- (a) Paved roads and parking lots:
 - (1) power brooming while wet, either from rain or application of water, on an as needed basis.

- (b) Unpaved roads and parking lots:
 - (1) paving with asphalt;
 - (2) treating with emulsified asphalt on an as needed basis;
 - (3) treating with water on an as needed basis;
 - (4) double chipping and sealing the road surface and maintaining on an as needed basis.

Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:

- (a) maintaining minimum size and number of stock piles of aggregate;
- (b) treating around the stockpile area with emulsified asphalt;
- (c) treating around the stockpile area with water;
- (d) treating the stockpiles with water.

Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:

- (a) applying water at the feed and the intermediate points.

Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:

- (a) minimizing the vehicular distance between transfer points;
- (b) enclosing the transfer points;
- (c) applying water on transfer points on an as needed basis.

Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:

- (a) tarping the aggregate hauling vehicles;
- (b) maintaining vehicle bodies in a condition to prevent leakage;
- (c) spraying the aggregates with water;
- (d) maintaining a 10 MPH speed limit in the yard.

Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:

- (a) reducing free fall distance to a minimum;
- (b) reducing the rate of discharge of the aggregate;
- (c) spraying the aggregate with water on an as needed basis.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a
Federally Enforceable State Operating Permit Renewal

Source Name: Milestone Contractors, L.P.
Source Location: 5245 North Indianapolis Road, Columbus, IN 47201
County: Bartholomew
SIC Code: 2951
Permit Renewal No.: F005-24413-00052
Permit Reviewer: Meredith W. Jones

On March 11, 2008, the Office of Air Quality (OAQ) had a notice published in The Republic in Columbus, Indiana, stating that Milestone Contractors, L.P. had applied for a Federally Enforceable State Operating Permit renewal for a stationary drum mix asphalt pavement production plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes. No changes have been made to the TSD, however, because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

OAQ Change:

The OAQ has learned that the parts washer used for degreasing operations, listed as insignificant activity (o) in the draft permit, has been removed from the source. This insignificant activity has therefore been removed from Condition A.3, and Section D.3 has been removed, as follows:

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:

...

~~(o)~~ ~~degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (parts washer using non-HAP Safety Kleen or Crystal Clean solvent) [326 IAC 8-3-2];~~

~~(p)~~ **(o)** cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or; having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

~~(q)~~ **(p)** closed loop heating and cooling systems;

~~(r)~~ **(q)** paved and unpaved roads and parking lots with public access [326 IAC 6-5]; and

~~(s)~~ **(r)** two (2) RAP feed bins with two (2) feed conveyors.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

SECTION D.3 — EMISSION UNIT OPERATION CONDITIONS

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

- (a) ~~degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (parts washer using non-HAP Safety Kleen or Crystal Clean solvent). [326 IAC 8-3-2]~~

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

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee shall:~~

- ~~(a) equip the cleaner with a cover;~~
- ~~(b) equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) provide a permanent, conspicuous label summarizing the operation requirements;~~
- ~~(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

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:	Milestone Contractors, L.P.
Source Location:	5245 N. Indianapolis Rd, Columbus, IN 47201
County:	Bartholomew
SIC Code:	2951
Permit Renewal No.:	F005-24413-00052
Permit Reviewer:	Meredith W. Jones

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Milestone Contractors, L.P. relating to the operation of a stationary drum mix asphalt pavement production plant.

History

On March 7, 2007, Milestone Contractors, L.P. submitted an application to the OAQ requesting to renew its operating permit. Milestone Contractors, L.P. was issued a FESOP on December 9, 1996 and its first FESOP Renewal on December 12, 2002.

Permitted Emission Units and Pollution Control Equipment

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

- (a) one (1) aggregate counter-flow drum mixer, identified as emission unit No. 2, with a maximum capacity of 450 tons per hour, equipped with one (1) natural gas-fired aggregate dryer/burner with a maximum rated capacity of 135 million British thermal units (MMBtu) per hour, using No. 2 fuel oil and re-refined waste oil as back-up fuels, using one (1) baghouse with a primary dust collector as control, constructed in 1992, and exhausting at one (1) stack, identified as S-1;
- (b) one (1) dragslat conveyor, two (2) feed conveyors, and one (1) screen; and
- (c) cold mix (stockpile mix) asphalt storage piles.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

Emission Units and Pollution Control Equipment Removed From the Source

The following have been removed from the source:

- (a) one (1) aggregate counter-flow recycled asphalt pavement (RAP) drum mixer, identified as emission unit No. 30, with a maximum capacity of 225 tons per hour, equipped with one (1) natural gas fired RAP dryer/burner with a maximum rated capacity of 75.6 million (MM) British thermal units (Btu) per hour using No. 2 distillate fuel oil and re-refined waste oil as back-up fuels and one (1) baghouse with a primary dust collector for air pollution control, exhausting at one (1) stack, identified as S-1;
- (b) one (1) feed conveyor; and
- (c) one (1) stack, identified as S-2B.

Insignificant Activities

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

- (a) one (1) re-refined waste oil storage tank, identified as Tank 22, constructed in 2000, with a maximum storage capacity of 21,000 gallons, exhausting at one (1) stack;
- (b) one (1) distillate No. 2 fuel oil-fired liquid asphalt tank heater, identified as emission unit No. 13, rated at 1.3 MMBtu per hour, exhausting at one (1) stack, identified as S-2A;
- (c) two (2) No. 2 fuel oil-fired liquid asphalt tank heaters, identified as emission units No. 15 and No. 17, rated at 0.45 and 1.86 MMBtu per hour, respectively, with the emissions from unit No. 15 exhausted through two (2) stacks, identified as S-4A and S-4B, and the emissions from unit No. 17 exhausted through two (2) stacks, identified as S-6A, and S-6B;
- (d) two (2) liquid asphalt storage tanks, identified as Tank 12 and Tank 14, each constructed in 1974, each with a maximum storage capacity of 26,000 gallons;
- (e) two (2) liquid asphalt storage tanks, identified as Tank 16 and Tank 17, each constructed in 2003, each with a maximum storage capacity of 20,000 gallons;
- (f) aggregate storage piles;
- (g) five (5) hot mix asphalt cement storage silos, each with a maximum storage capacity of 300 tons;
- (h) one (1) cold feed bin consisting of eight (8) compartments;
- (i) VOC and HAP storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons;
- (j) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (k) a laboratory as defined in 326 IAC 2-7-1(21)(D);
- (l) one (1) natural gas-fired space heater rated at 0.1 MMBtu per hour located in the laboratory;
- (m) combustion source flame safety purging on startup;
- (n) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (o) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (parts washer using non-HAP Safety Kleen or Crystal Clean solvent) [326 IAC 8-3-2];
- (p) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or; having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (q) closed loop heating and cooling systems;
- (r) paved and unpaved roads and parking lots with public access [326 IAC 6-5]; and
- (s) two (2) RAP feed bins with two (2) feed conveyors.

Under 40 CFR 60, Subpart I, this asphalt plant is considered an affected facility.

Existing Approvals

Since the issuance of the first FESOP Renewal, No. F005-14110-00052, on December 12, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Permit Revision No. 005-17423-00052 issued on August 20, 2003; and
- (b) Administrative Amendment No. 005-20465-00052 issued on February 25, 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.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

- (a) SO₂ and NO_x limits

Source-wide emissions of SO₂ and NO_x were limited to 99 tons per year, each, by the previous permit, F005-14110-00052, and subsequently to 90 tons per year, each, by the Second Significant Permit Revision, 005-17423-00052. Emissions of these pollutants are limited to 95 tons per year, each, in the attached permit, as requested by the Permittee.

- (b) Requirements pursuant to 40 CFR 60.110b, Subpart Kb (New Source Performance Standard for Volatile Organic Liquid Storage Vessels)

None of the tanks at this source are subject to 40 CFR 60.110b, Subpart Kb. The requirements of this rule have therefore been removed from the permit.

- (c) Sulfur content limit for No. 2 fuel oil

The limit on the sulfur content of the No. 2 fuel oil combusted in the aggregate dryer/burner has been reduced to 0.44% so that the source is able to comply with the sulfur dioxide emissions limit of five-tenths (0.5) pound per MMBtu, pursuant to 326 IAC 7-1.1, for distillate oil combustion.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Bartholomew County has been classified as unclassifiable or attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Bartholomew County has been designated as attainment for ozone. Therefore, emissions of VOC and NO_x 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) Bartholomew County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
 Since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	55,607.05
PM ₁₀	13,081.41
SO ₂	551.28
VOC	978.95
CO	49.30
NO _x	164.62

HAPs	tons/year
Arsenic	0.002
Benzene	0.769
Beryllium	0.002
Cadmium	0.002
Chromium	0.002
Ethylbenzene	0.473
Formaldehyde	6.110
Hexane	1.813
HCl	57.816
Isooctane	0.079
Lead	1.951
Manganese	0.004
Mercury	0.002
Methyl chloroform	0.095
Nickel	0.002
Selenium	0.009
Toluene	5.716

HAPs	tons/year
Total PAH HAPs	1.734
Xylene	0.394
Total	76.97

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀, SO₂, VOC, and NO_x is greater than 100 tons per year, each. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit its PM₁₀, SO₂, VOC, and NO_x emissions to less than Title V levels. The source will therefore be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of CO is 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 equal to or greater 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 equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit its single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

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
Aggregate Dryer/Burner ¹	67.66 ²	82.85	86.98	19.01	27.81	92.7	24.00
Misc. Combustion	0.23	0.38	8.02	0.04	0.6	2.3	negl
Conveying/Handling ³	2.02	0.96	---	---	---	---	---
Unpaved Roads ³	57.84	14.74	---	---	---	---	---
Aggregate Storage ³	0.23	0.08	---	---	---	---	---
Cold mix VOC Storage ¹	---	---	---	76.54	---	---	---
Storage Tanks	---	---	---	3.0	---	---	---
Total Emissions	127.98	99.0	95.0	98.59	28.41	95.0	24.00

¹ Emissions from this unit are limited pursuant to IAC 2-8 (FESOP).

² Limited pursuant to 40 CFR 60.90, Subpart I.

³ Potential to emit after controls.

- (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.

Federal Rule Applicability

- (a) This source is subject to the New Source Performance Standards for Hot Mix Asphalt Facilities (40 CFR 60.90, Subpart I) because this source meets the definition of a hot mix asphalt facility pursuant to the rule and the source was constructed after June 11, 1973. This rule limits particulate matter emissions to 0.04 grains per dry standard cubic foot (gr/dscf) and visible emissions to 20% opacity. The source will be able to comply with 40 CFR 60.90, Subpart I by using a baghouse with a primary dust collector to limit particulate matter emissions from the aggregate dryer/burner to less than 0.04 gr/dscf.

The aggregate dryer/burner is subject to the following portions of 40 CFR 60, Subpart I:

- (1) 40 CFR 60.90.
- (2) 40 CFR 60.91.
- (3) 40 CFR 60.92.
- (4) 40 CFR 60.93.

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

- (b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60.110 - 60.117b, Subparts K, Ka, and Kb, are not included in the permit.
 - (1) The one (1) 21,000 gallon (79.49 m³) re-refined waste oil storage tank, identified as Tank 22, constructed in 2000, is not subject to 40 CFR 60.110b, Subpart Kb because, while the capacity of the tank is greater than or equal to 75 m³ but less than 151 m³, the maximum true vapor pressure of the stored liquid is less than 15.0 kPa.
 - (2) The two (2) 26,000 gallon liquid asphalt storage tanks, identified as Tank 12 and Tank 14, each constructed in 1974, are not subject to 40 CFR 60.110, Subpart K because each tank has a storage capacity of less than 40,000 gallons.
 - (3) The two (2) 20,000 gallon (75.71 m³) liquid asphalt storage tanks, identified as Tank 16 and Tank 17, each constructed in 2003, are not subject to 40 CFR 60.110b, Subpart Kb because, while the capacity of each tank is greater than or equal to 75 m³ but less than 151 m³, the maximum true vapor pressure of the stored liquid in each tank is less than 15.0 kPa.
- (c) 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.
- (d) The parts washer, an insignificant activity, is not subject to the requirements of the National Emission Standards for Halogenated Solvent Cleaning, 40 CFR 63.460 through 63.471, Subpart T, because this unit does not use a halogenated HAP cleaning solvent.

State Rule Applicability - Entire Source

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

This source, constructed in 1992, is not subject to the requirements of this rule. The source is not one of the twenty-eight (28) listed source categories, but it does have an unrestricted potential to emit greater than two hundred fifty (250) tons per year of PM, PM₁₀, SO₂, and VOC. However, this source will remain a minor source pursuant to 326 IAC 2-2 (PSD) because, as shown in the "Potential to Emit After Issuance" table above, the allowable emissions of all regulated pollutants will remain less than 250 tons per year after application of all federally enforceable emission limits.

The source shall limit PM emissions from the aggregate dryer/burner to 0.096 pound PM per ton of hot mix asphalt produced based on a maximum throughput of 450 tons of asphalt mix per hour. Source-wide emissions of PM₁₀, SO₂, and VOC are limited to less than 100 tons per year, each. These limits are discussed below under 326 IAC 2-8-4 (FESOP).

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source has limited

emissions of all single HAPs to less than 10 tons per year and limited emissions of a combination of HAPs to less than 25 tons per year. HCl emissions shall be limited to 6.82 tons per year, thus limiting combined HAP emissions to 24 tons per year, as described under 326 IAC 2-8-4 (FESOP). Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program; is not located in Lake County, Porter County, or LaPorte County; and does not emit lead into the ambient air at levels equal to or greater than five (5) 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 Alternative Opacity Limitations), 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 2-8-4 (FESOP)

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

- (a) The usage of re-refined waste oil, with content limits of 0.75% sulfur and 0.2% chlorine, and equivalents in the aggregate dryer/burner shall be limited to 1033.33 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will ensure that source-wide SO₂ emissions are less than 100 tons per year, HCl emissions are less than 10 tons per year, and emissions of the combination of HAPs are less than 25 tons per year.
- (b) The usage of No. 2 fuel oil, with a maximum sulfur content of 0.44%, and equivalents in the aggregate dryer/burner shall be limited to 2518.27 kilogallons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will ensure that source-wide SO₂ emissions are less than 100 tons per year.
- (c) The usage of natural gas and equivalents in the aggregate dryer/burner shall be limited to 662.13 million cubic feet (MMcf) per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will ensure that source-wide NO_x emissions are less than 100 tons per year.
- (d) Gelled asphalt with VOC solvent liquid binder, containing a maximum of 25.9% of the liquid binder of VOC solvent and 2.5% by weight of the VOC solvent evaporating, used in the production of cold mix asphalt shall not exceed 3062 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to limiting the VOC emitted from solvent use to 76.54 tons per twelve (12) consecutive month period so that source-wide VOC emissions are less than 100 tons per twelve (12) consecutive month period.
- (e) PM₁₀ emissions from the aggregate dryer and mixer shall be limited to 0.04 pound PM₁₀ per ton of asphalt mix, which is equivalent to 18.92 pounds per hour, based on a maximum throughput of 450 tons of asphalt mix per hour. The source is able to comply with the PM₁₀ emission limit through use of a baghouse with a primary dust collector.

Compliance with these limits will render the requirements of 326 IAC 2-7 (Part 70) and IAC 2-2 (PSD) not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source.

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

This source is subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source which has not received all the necessary preconstruction approvals before December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. The fugitive dust control plan for this source is as follows:

- (a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:
 - (1) Paved roads and parking lots:
 - (A) power brooming while wet, either from rain or application of water, on an as needed basis.
 - (2) Unpaved roads and parking lots:
 - (A) paving with asphalt;
 - (B) treating with emulsified asphalt on an as needed basis;
 - (C) treating with water on an as needed basis;
 - (D) double chipping and sealing the road surface and maintaining on an as needed basis.
- (b) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:
 - (1) maintaining minimum size and number of stock piles of aggregate;
 - (2) treating around the stockpile area with emulsified asphalt;
 - (3) treating around the stockpile area with water;
 - (4) treating the stockpiles with water.
- (c) Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:
 - (1) applying water at the feed and the intermediate points.
- (d) Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:
 - (1) minimizing the vehicular distance between transfer points;
 - (2) enclosing the transfer points;
 - (3) applying water on transfer points on an as needed basis.
- (e) Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:
 - (1) tarping the aggregate hauling vehicles;
 - (2) maintaining vehicle bodies in a condition to prevent leakage;
 - (3) spraying the aggregates with water;
 - (4) maintaining a 10 MPH speed limit in the yard.

- (f) Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:
- (1) reducing free fall distance to a minimum;
 - (2) reducing the rate of discharge of the aggregate;
 - (3) spraying the aggregate with water on an as needed basis.

State Rule Applicability – Individual Facilities

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

The aggregate dryer/burner is not subject to the requirements of 326 IAC 6-3-2 because the particulate matter limitation established in 326 IAC 12, concerning New Source Performance Standards (15.45 pounds of PM per hour), is more stringent than the particulate limitation established in this rule (67.7 pounds of PM per hour).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations):

- (a) Sulfur dioxide emissions from the aggregate dryer/burner shall be limited to five-tenths (0.5) pound per MMBtu for distillate oil combustion. In order to comply with this limit, the sulfur content of the No. 2 fuel oil combusted in this unit shall not exceed 0.44%.
- (b) Sulfur dioxide emissions from the aggregate dryer/burner shall be limited to one and six-tenths (1.6) pounds per MMBtu for residual oil combustion. In order to comply with this limit, the sulfur content of the re-refined waste oil combusted in this unit shall not exceed 1.3%. The Permittee will comply with this limit by using re-refined waste with a maximum sulfur content of 0.75%.
- (c) The three (3) No. 2 fuel oil-fired asphalt storage tank heaters, with heat input capacities of 1.3 MMBtu/hr, 0.45 MMBtu/hr, and 1.86 MMBtu/hr, and the one (1) natural gas-fired space heater, with a heat input capacity of 0.1 MMBtu/hr, are not subject to the requirements of this rule because potential SO₂ emissions from each of these units are less than twenty-five (25) tons per year or ten (10) pounds per hour.

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

This source is subject to 326 IAC 7-2-1 (Reporting Requirements), which requires the source to submit to the Office of Air Quality reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate in pounds per MMBtu upon request.

326 IAC 8-3-2 (Cold Cleaner Operation)

The parts washer, an insignificant activity, is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) since it was constructed after January 1, 1980 and performs organic solvent degreasing operations. Pursuant to this rule, the Permittee shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements;

- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The parts washer, an insignificant activity, is not subject to the requirements of 326 IAC 8-3-5 because the source is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph Counties and it was constructed after July 1, 1990.

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

This rule applies to any paving application anywhere in the state. No person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

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

This source uses gelled asphalt to manufacture stockpile mix on a limited basis. The gelled asphalt contains less than 7% oil distillate by volume. It is only manufactured during the winter months and is in compliance with 326 IAC 8-5-2.

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:

The conveying, material transfer points, screening, and mixing and drying operation have applicable compliance determination conditions as specified below:

- (a) Visible emission notations of the conveyors, transfer points, and the aggregate mixing and drying operation stack 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.

- (b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the aggregate dryer/burner at least once per day when the aggregate dryer/burner is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (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). 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 emission unit shall be shut down no later than the completion of the processing of the material in the emission 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).

These monitoring conditions are necessary because the baghouse with a primary dust collector controlling the aggregate dryer, mixer, and burner must operate properly to ensure compliance with 40 CFR 60.90, Subpart I (Standards for Hot Mix Asphalt Facilities), 326 IAC 2-8 (FESOP), and 326 IAC 2-2 (PSD).

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 March 7, 2007.

Conclusion

The operation of this stationary drum mix asphalt pavement production plant shall be subject to the conditions of the attached FESOP Renewal No. F005-24413-00052.

Emissions Summary

*****Source-wide Emissions Before Controls*****

PM = 55,607.05 tons/yr
 PM-10 = 13,081.41 tons/yr
 SO₂ = 551.28 tons/yr
 NO_x = 164.62 tons/yr
 VOCs* = 978.95 tons/yr *VOCs include HAPs from
 CO = 49.30 tons/yr aggregate drying operation

*****Emissions After Controls*****

Unpaved Roads: (Fugitive)

PM =	115.68 tons/yr	x	50%	emitted after controls =	57.84 tons/yr
PM-10 =	29.48 tons/yr	x	50%	emitted after controls =	14.74 tons/yr

Storage Piles: (Fugitive)

PM =	0.46 tons/yr	x	50%	emitted after controls =	0.23 tons/yr
PM-10 =	0.16 tons/yr	x	50%	emitted after controls =	0.08 tons/yr

Cold Mix VOC Storage: (Fugitive)

VOCs =	956.80 tons/yr	x	8%	emitted after controls =	76.54 tons/yr
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Misc. Combustion Sources: (Non-Fugitive)

PM =	0.23 tons/yr	x	100%	emitted after controls =	0.23 tons/yr
PM-10 =	0.38 tons/yr	x	100%	emitted after controls =	0.38 tons/yr

Conveying & Handling:

PM =	4.04 tons/yr	x	50%	emitted after controls =	2.02 tons/yr
PM-10 =	1.91 tons/yr	x	50%	emitted after controls =	0.96 tons/yr

Aggregate Dryer/Burner: (Non-Fugitive)

PM =	55,486.65 tons/yr	x	0.08%	emitted after controls =	44.39 tons/yr
PM-10 =	13,049.48 tons/yr	x	0.08%	emitted after controls =	10.44 tons/yr
VOCs =	22.11 tons/yr	x	100%	emitted after controls =	22.11 tons/yr

*****Total Source-wide Emissions After Limits and Controls*****

	Non-Fugitive	Fugitive	Total
PM =	46.64 tons/yr	58.07 ton/yr	104.70 tons/yr
PM-10 =	11.77 tons/yr	14.82 ton/yr	26.59 tons/yr
SO ₂ =	95.00 tons/yr	0.00 ton/yr	95.00 tons/yr
NO _x =	95.00 tons/yr	0.00 ton/yr	95.00 tons/yr
VOCs =	19.05 tons/yr	79.54 ton/yr	98.59 tons/yr
CO =	28.41 tons/yr	0.00 ton/yr	28.41 tons/yr

*****Source-wide HAP Emissions*****

	Uncontrolled Emissions	Limited and Controlled Emissions
Arsenic =	0.002 tons/yr	1.89E-06 tons/yr
Benzene =	0.769 tons/yr	0.77 tons/yr
Beryllium =	0.002 tons/yr	1.42E-06 tons/yr
Cadmium =	0.002 tons/yr	1.42E-06 tons/yr
Chromium =	0.002 tons/yr	1.42E-06 tons/yr
Ethylbenzene =	0.473 tons/yr	0.47 tons/yr
Formaldehyde =	6.110 tons/yr	6.11 tons/yr
Hexane =	1.813 tons/yr	1.81 tons/yr
HCl =	57.816 tons/yr	6.82 tons/yr
Isooctane =	0.079 tons/yr	7.88E-02 tons/yr
Lead =	1.951 tons/yr	1.64E-04 tons/yr
Manganese =	0.004 tons/yr	2.84E-06 tons/yr
Mercury =	0.002 tons/yr	1.42E-06 tons/yr
Methyl chloroform =	0.095 tons/yr	9.46E-02 tons/yr
Nickel =	0.002 tons/yr	1.42E-06 tons/yr
Selenium =	0.009 tons/yr	7.10E-06 tons/yr
Toluene =	5.716 tons/yr	5.72 tons/yr
Total PAH HAPs =	1.734 tons/yr	1.73 tons/yr
Xylene =	0.394 tons/yr	0.39 tons/yr
Total =	76.97 tons/yr	24.00 tons/yr

Unpaved Roads

Total PM Emissions from Unpaved Roads = 115.68 tons/yr
Total PM-10 Emissions from Unpaved Roads = 29.48 tons/yr

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 13.2.2.2.

I. Tri-Axle Dump Trucks to Aggregate Storage Piles

$$10.79 \text{ (trips/hr)} \times 0.07 \text{ (mile/trip)} \times 2 \text{ (round trip)} \times 8760 \text{ (hrs/yr)} = 13,232.86 \text{ VMT/yr}$$

$$E_f = (k * [(s/12)^a] * [(W/3)^b] / [(M/0.2)^c] * [(365-p)/365])$$

$$= 4.32 \text{ lb PM/ vehicle mile traveled (VMT)}$$

$$= 1.10 \text{ lb PM-10/ vehicle mile traveled (VMT)}$$

where k = 4.9 particle size multiplier for PM-30 (TSP)
1.5 particle size multiplier for PM-10
s = 4.8 mean % silt content of unpaved roads
a = 0.7 constant for PM-30 (TSP)
0.9 constant for PM-10
W = 24 average vehicle weight (tons)
b = 0.45 constant for PM-10 and PM-30 (TSP)
M = 0.2 default % surface material moisture content for dry conditions
c = 0.3 constant for PM-30 (TSP)
0.2 constant for PM-10
p = 125 number of days per year with at least 0.01 inch of precipitation

PM:	4.32	(lbs/VMT) x	13,232.86	(VMT/yr)	/	2000	(lbs/ton)	=	28.61	tons/yr
PM-10:	1.10	(lbs/VMT) x	13,232.86	(VMT/yr)	/	2000	(lbs/ton)	=	7.29	tons/yr

II. Tri-Axle Dump Trucks to RAP Storage Piles

$$3.33 \text{ (trips/hr)} \times 0.05 \text{ (mile/trip)} \times 2 \text{ (round trip)} \times 8760 \text{ (hrs/yr)} = 2,917.08 \text{ VMT/yr}$$

$$E_f = (k * [(s/12)^a] * [(W/3)^b] / [(M/0.2)^c] * [(365-p)/365])$$

$$= 4.32 \text{ lb PM/ vehicle mile traveled (VMT)}$$

$$= 1.10 \text{ lb PM-10/ vehicle mile traveled (VMT)}$$

where k = 4.9 particle size multiplier for PM-30 (TSP)
1.5 particle size multiplier for PM-10
s = 4.8 mean % silt content of unpaved roads
a = 0.7 constant for PM-30 (TSP)
0.9 constant for PM-10
W = 24 average vehicle weight (tons)
b = 0.45 constant for PM-10 and PM-30 (TSP)
M = 0.2 default % surface material moisture content for dry conditions
c = 0.3 constant for PM-30 (TSP)
0.2 constant for PM-10
p = 125 number of days per year with at least 0.01 inch of precipitation

PM:	4.32	(lbs/VMT) x	2,917.08	(VMT/yr)	/	2000	(lbs/ton)	=	6.31	tons/yr
PM-10:	1.10	(lbs/VMT) x	2,917.08	(VMT/yr)	/	2000	(lbs/ton)	=	1.61	tons/yr

III. Front End Loader

$$29.85 \text{ (trips/hr)} \times 0.05 \text{ (mile/trip)} \times 2 \text{ (round trip)} \times 8760 \text{ (hrs/yr)} = 26,148.60 \text{ VMT/yr}$$

$$E_f = (k * [(s/12)^a] * [(W/3)^b] / [(M/0.2)^c] * [(365-p)/365])$$

$$= 6.18 \text{ lb PM/ vehicle mile traveled (VMT)}$$

$$= 1.57 \text{ lb PM-10/ vehicle mile traveled (VMT)}$$

where k = 4.9 particle size multiplier for PM-30 (TSP)
1.5 particle size multiplier for PM-10
s = 4.8 mean % silt content of unpaved roads
a = 0.7 constant for PM-30 (TSP)
0.9 constant for PM-10
W = 53 average vehicle weight (tons)
b = 0.45 constant for PM-10 and PM-30 (TSP)
M = 0.2 default % surface material moisture content for dry conditions
c = 0.3 constant for PM-30 (TSP)
0.2 constant for PM-10
p = 125 number of days per year with at least 0.01 inch of precipitation

PM:	6.18	(lbs/VMT) x	26,148.60	(VMT/yr)	/	2000	(lbs/ton)	=	80.76	tons/yr
PM-10:	1.57	(lbs/VMT) x	26,148.60	(VMT/yr)	/	2000	(lbs/ton)	=	20.58	tons/yr

*****Storage*****

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8760 hours of use and US EPA's AP 42 (Pre-1983 Edition), Section 11.2.3.

Material	Silt Content (wt %)	Pile Size (acres)	Storage Capacity (tons)	Pile Height (feet)	Emission Factor (lbs/acre/day)	PM Emissions (tons/yr)	PM-10 Emissions (tons/yr)
Stone	0.8	1.15	25,000	10	0.93	0.19	0.07
Sand	1.2	0.27	7,000	10	1.39	0.08	0.03
Gravel	0.6	0.28	6,000	10	0.69	0.03	0.01
Slag	1.2	0.12	2,500	10	1.39	0.03	0.01
RAP	0.2	3.20	60,000	10	0.23	0.12	0.04
Totals:						0.46	0.16

PM = 0.46 tons/yr
PM-10 (35% of PM) = 0.16 tons/yr

Methodology:

$$E_f \text{ (lbs/acre/day)} = 1.7 * (s/1.5) * [(365-p) / 235] * (f/15)$$

where s = silt content (weight %)
p = 125 days per year with rainfall greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

$$PTE \text{ (tons/yr)} = E_f * sc * (20 \text{ cuft/ ton}) * (365 \text{ day/ yr}) * (1 \text{ ton/ 2000 lbs}) * (1 \text{ acre/ 43,560 sqft}) * (1/ \text{height})$$

where sc = storage capacity (tons)
height = pile height (feet)

*****Cold Mix VOC Storage*****

The following calculations determine the amount of VOC emissions produced from the application of stockpile mix containing gelled asphalt. 2.5% of the weight of the gelled asphalt evaporates as VOCs. The following calculations are based on 8760 hours of use.

Potential VOC Emissions = 956.80 tons/yr
Potential VOC Emissions After Controls* = 76.54 tons/yr

* This is equivalent to 3062 tons of gelled asphalt binder solvent used per year, based on 2.5% of VOC solvent evaporating.

Methodology:

$$\text{Potential Binder Throughput (stockpile mix) (tons/yr)} = 3,942,000.00$$

$$\text{VOC Emission Factor (weight \% flash-off of cold mix)} = 2.5\%$$

$$\text{Potential VOC Emissions (tons/yr)} = \text{Potential Throughput (tons/yr)} * (\text{VOC Emission Factor} / 103)$$

Pursuant to the FESOP program, source-wide emissions of VOCs shall be limited to less than 100 tons per year. Limiting the amount of gelled asphalt binder solvent used to 3062 tons per year will in turn limit source-wide emission of VOCs to less than 100 tons per year as shown below:

76.54 tons/yr (VOC emission from cold mix VOC storage)
+
22.05 tons/yr (VOC emissions from misc. comb., aggregate drying, fuel combustion in the aggregate dryer/burner, and storage tanks)
=
98.59 tons VOCs/yr

Company Name: Milestone Contractors, L.P.
Address : 5245 N. Indianapolis Rd, Columbus, IN 47201
Permit Number: F005-24413-00052
Reviewer: Meredith W. Jones
Date: 12/05/07

*****Miscellaneous Combustion Sources*****

The maximum potential emissions from the miscellaneous combustion sources are as follows:

PM = 0.23 tons/yr
PM-10 = 0.38 tons/yr
SO₂ = 8.02 tons/yr
NO_x = 2.30 tons/yr
VOCs = 0.04 tons/yr
CO = 0.60 tons/yr

This source has three (3) No. 2 fuel oil-fired asphalt storage tank heaters, with heat input capacities of 1.3 MMBtu/hr, 0.45 MMBtu/hr, and 1.86 MMBtu/hr, and one (1) natural gas-fired space heater, with a heat input capacity of 0.1 MMBtu/hr.

No. 2 Fuel Oil

The following calculations determine the emissions created by the combustion of No. 2 distillate fuel oil at 0.5 % sulfur, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
PM*	2.0	0.23
PM-10**	3.3	0.37
SO₂	71.0	8.02
NO_x	20.0	2.26
VOCs	0.3	0.04
CO	5.0	0.56

*PM emission factor is filterable PM only.

**PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Heat Input Capacity = 3.61 MMBtu/hr

Heating Value = 140 MMBtu/10³ gal

Potential to Emit (tons/yr) = 3.61 (MMBtu/hr) * (8760 hr/ 1 yr) * (10³ gal/ 140 MMBtu) * (1 ton/ 2000 lbs) * Ef (lbs/10³ gal)

Natural Gas

The following calculations determine the emissions created by natural gas combustion, based on 8760 hours of operation and US EPA's AP 42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ⁶ scf)	Potential to Emit (tons/yr)
PM*	1.9	0.001
PM-10**	7.6	0.003
SO₂	0.6	0.000
NO_x	100.0	0.043
VOCs	5.5	0.002
CO	84.0	0.036

*PM emission factor is filterable PM only.

**PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Heat Input Capacity = 0.1 MMBtu/hr

Heating Value = 1020 MMBtu/10⁶ scf

Potential to Emit (tons/yr) = 0.1 (MMBtu/hr) * (8760 hr/ 1 yr) * (10⁶ scf/ 1020 MMBtu) * (1 ton/ 2000 lbs) * Ef (lb/10⁶ scf)

*****Aggregate Drying: Drum-mix Plant*****

The following calculations determine the worst-case emissions created by aggregate drying, before controls, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Tables 11.1-3, 11.1-8, and 11.1-10 for a drum mix dryer which has the capability of combusting either fuel oil or natural gas.

Pollutant	Emission Factor (lbs/ton)	Potential to Emit (tons/yr)
PM	28	55,188.00
PM-10	6.5	12,811.50
VOC*	8.72E-03	17.19

*The VOC emission factor for aggregate drying includes organic HAP emissions, which are assumed to be VOC.

Methodology:

$$\text{Potential to Emit (tons/yr)} = \text{Ef (lb/ton)} * 450 \text{ (tons/hr)} * (8760 \text{ hr/ 1 yr}) * (1 \text{ ton/ 2000 lbs})$$

*****Conveying/Handling*****

The following calculations determine the emissions created by material handling, based on 8760 hours of operation and US EPA's AP 42, Section 13.2.4, Equation 1.

$$\begin{aligned} \text{Emission Factor (Ef)} &= k * (0.0032) * (((U/5)^{1.3}) / ((M/2)^{1.4})) \\ &= 2.05\text{E-}03 \text{ lbs PM/ton;} \\ &\quad 9.69\text{E-}04 \text{ lbs PM-10/ton} \end{aligned}$$

where k = 0.35 particle size multiplier for <10µm;
 0.74 particle size multiplier for <30µm
 U = 12 mean wind speed (mph)
 M = 5.0 material moisture content (%)

$$\text{Emissions (tons/yr)} = \text{Ef (lbs/ton of material)} * 450 \text{ (tons/hr)} * (8760 \text{ hr/ yr}) * (1 \text{ ton/ 2000 lbs})$$

PM Emissions = 4.04 tons/yr
PM-10 Emissions = 1.91 tons/yr

*****Aggregate Dryer/Burner*****

Uncontrolled potential emissions from fuel combustion in the aggregate dryer/burner:

	<u>Emissions</u>	<u>Worst-case Fuel</u>
PM =	298.65 tons/yr	Re-refined Waste Oil
PM-10 =	237.98 tons/yr	Re-refined Waste Oil
SO₂ =	543.26 tons/yr	Re-refined Waste Oil
NO_x =	162.32 tons/yr	Natural Gas
VOCs =	4.93 tons/yr	Re-refined Waste Oil
CO =	48.70 tons/yr	Natural Gas

Natural Gas

The following calculations determine the emissions created by natural gas combustion, based on 8760 hours of operation and US EPA's AP 42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ⁶ scf)	Potential to Emit (tons/yr)
PM*	1.9	1.10
PM-10**	7.6	4.41
SO₂	0.6	0.35
NO_x	280.0	162.32
VOCs	5.5	3.19
CO	84.0	48.70

*PM emission factor is filterable PM only.

**PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Heat Input Capacity = 135 MMBtu/hr

Heating Value = 1020 MMBtu/10⁶ scf

Potential to Emit (tons/yr) = 135 (MMBtu/hr) * (8760 hr/ 1 yr) * (10⁶ scf/ 1020 MMBtu) * (1 ton/ 2000 lbs) * Ef (lb/10⁶ scf)

No. 2 Fuel Oil

The following calculations determine the emissions created by the combustion of No. 2 fuel oil at 0.44 % sulfur, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
PM*	2.0	8.45
PM-10**	3.3	13.94
SO₂	69.1	291.76
NO_x	24.0	101.37
VOCs	0.2	0.84
CO	5.0	21.12

*PM emission factor is filterable PM only.

**PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Heat Input Capacity = 135 MMBtu/hr

Heating Value = 140 MMBtu/10³ gal

Potential to Emit (tons/yr) = 135 (MMBtu/hr) * (8760 hr/ 1 yr) * (10³ gal/ 140 MMBtu) * (1 ton/ 2000 lbs) * Ef (lbs/10³ gal)

Re-refined Waste Oil

The following calculations determine the emissions created by the combustion of re-refined waste oil at 0.75 % sulfur, and 0.947 % ash, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, and 1.11-3.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
PM	60.61	298.65
PM-10	48.30	237.98
SO₂	110.25	543.26
NO_x	19.00	93.62
VOCs	1.00	4.93
CO	5.00	24.64

Methodology:

Heat Input Capacity = 135 MMBtu/hr

Heating Value = 120 MMBtu/10³ gal

Potential to Emit (tons/yr) = 135 (MMBtu/hr) * (8760 hr/ 1 yr) * (10³ gal/ 120 MMBtu) * (1 ton/ 2000 lbs) * Ef (lbs/10³ gal)

*****HAPs: Aggregate Dryer/Burner*****

The table below indicates the HAP emissions, both before and after controls, created by the aggregate dryer when combusting No. 2 fuel oil. Emissions were calculated based on 8760 hours of use and emission factors from US EPA's AP 42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Table 1.3-10.

	Emission Factor (Ef) (lb/10 ¹² Btu)	Potential to Emit (tons/yr)	Controlled Emissions (tons/yr)
Arsenic	4	2.37E-03	1.89E-06
Beryllium	3	1.77E-03	1.42E-06
Cadmium	3	1.77E-03	1.42E-06
Chromium	3	1.77E-03	1.42E-06
Lead	9	5.32E-03	4.26E-06
Mercury	3	1.77E-03	1.42E-06
Manganese	6	3.55E-03	2.84E-06
Nickel	3	1.77E-03	1.42E-06
Selenium	15	8.87E-03	7.10E-06
Total (tons/yr) =		2.90E-02	2.32E-05

Methodology:

Heat Input Capacity = 135 MMBtu/hr

Control Efficiency = 99.92%

Potential to Emit (tons/yr) = 135 (MMBtu/hr) * Ef (lb/10¹² Btu) * (8760 hr/ 1 yr) * (1 ton/ 2000 lbs)

Controlled Emissions (tons/yr) = Potential to Emit * (1 - Control Efficiency)

The following table indicates the amount of lead and hydrogen chloride (HCl) emissions created by re-refined waste oil combustion at 0.0072 % lead and 0.2 % chlorine. Emissions are based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.11 - Waste Oil Combustion, Table 1.11-1.

	Emission Factor (Ef) (lb/10 ³ gal)	Potential to Emit (tons/yr)	Controlled Emissions (tons/yr)
Lead	0.396	1.95	1.56E-03
HCl	13.20	57.82	57.82
Total (tons/yr) =		59.77	57.82

Methodology:

Heat Input Capacity = 135 MMBtu/hr

Heating Value = 120 MMBtu/10³ gal

Control Efficiency = 99.92%

Potential to Emit (tons/yr) = 135 (MMBtu/hr) * Ef (lb/10³ gal) * (1 ton/ 2000 lbs) * (8760 hr/ 1 yr) * (10³ gal/ 120 MMBtu)

Lead Controlled Emissions (tons/yr) = Potential to Emit * (1 - Control Efficiency)

HCl Controlled Emissions (tons/yr) = HCl Uncontrolled Emissions (tons/yr)

*****HAPs: Aggregate Drying: Drum-mix Plant*****

The table below indicates the HAP emissions, both before and after controls, created by aggregate drying. Emissions were calculated based on 8760 hours of use; emission factors are from US EPA's AP 42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Table 11.1-10 for a drum mix dryer that can be fired with either fuel oil or natural gas. Emission factors represent the worst-case emissions, which are those created by waste oil combustion.

	Emission Factor (Ef) (lb/ton)	Potential to Emit (tons/yr)
Benzene	3.90E-04	0.77
Ethylbenzene	2.40E-04	0.47
Formaldehyde	3.10E-03	6.11
Hexane	9.20E-04	1.81
Isooctane	4.00E-05	0.08
Methyl chloroform	4.80E-05	0.09
Toluene	2.90E-03	5.72
Total PAH HAPs	8.800E-04	1.73
Xylene	2.00E-04	0.39
Total (tons/yr) =		17.18

Methodology:

Throughput = 450 tons/hr

Potential to Emit (tons/yr) = 450 (tons/hr) * Ef (lb/ton) * (8760 hr/ 1 yr) * (1 ton/ 2000 lbs)

Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr)

Fuel Usage Limits

Pursuant to the FESOP program, emissions of NO_x and SO₂ shall be limited to less than 100 tons per year, each, and emissions of any single HAP shall be limited to less than 10 tons per year, while emissions of the combination of HAPs shall be limited to less than 25 tons per year. However, emissions of NO_x and SO₂ are limited to 95 tons per year, as requested by the Permittee. These reductions in emissions will be achieved by limiting the type and amount of fuel that is combusted in the aggregate dryer/burner. The following calculations determine the maximum amount of natural gas, No. 2 fuel oil, and re-refined waste oil the Permittee can combust in this emission unit pursuant to the established limits.

****NO_x****

NO_x emissions from the aggregate dryer/burner shall be limited to 92.7 tons per year (95 tons per year - 2.3 tons per year of NO_x from miscellaneous combustion sources) as follows:*

Natural Gas
usage limit: 92.70 (tons/yr) / 280.0 (lbs/10⁶ scf) natural gas * 2000 (lbs/ton) = **662.13 10⁶ scf/yr**
No. 2 fuel oil fuel equivalence: 24.0 (lbs/10³ gal) No. 2 fuel oil / 280.0 (lbs/10⁶ scf) natural gas = 0.0857 10⁶ scf natural gas/ kgal No. 2 fuel oil

NO_x emissions from the combustion of 1 kgal of No. 2 fuel oil are equivalent to the amount of NO_x emissions created by the combustion of 0.0857 MMcf of natural gas.

waste oil fuel equivalence: 19.0 (lbs/10³ gal) waste oil / 280.0 (lbs/10⁶ scf) natural gas = 0.0679 10⁶ scf natural gas/ kgal waste oil

NO_x emissions from the combustion of 1kgal of re-refined waste oil are equivalent to the amount of NO_x emissions created by the combustion of 0.0679 MMcf of natural gas.

*No. 2 fuel oil usage is not limited here because potential NO_x emissions from this unit are reduced to less than 92.7 tons per year by the usage limit above

****SO₂****

SO₂ emissions from the aggregate dryer/burner shall be limited to 86.98 tons per year (95 tons per year - 8.02 tons per year of SO₂ from miscellaneous combustion sources) as follows:*

No. 2 Fuel Oil
usage limit: 86.98 (tons/yr) / 69.1 (lbs/10³ gal) * 2000 (lbs/ton) = **2518.27 kgal/yr**
waste oil fuel equivalence: 110.25 (lbs/10³ gal) waste oil / 69.1 (lbs/10³ gal) No. 2 fuel oil = 1.60 kgal No. 2 fuel oil/ waste oil

SO₂ emissions from the combustion of 1 kgal of waste oil are equivalent to the amount of SO₂ emissions created by the combustion of 1.60 kgal of No.2 fuel oil.

natural gas fuel equivalence: 0.6 (lbs/10⁶ scf) natural gas / 69.1 (lbs/10³ gal) No. 2 fuel oil = 0.009 kgal No. 2 fuel oil/ 10⁶ scf natural gas

SO₂ emissions from the combustion of 1 MMcf of natural gas are equivalent to the amount of SO₂ emissions created by the combustion of 0.009 kgal of No.2 fuel oil.

Re-refined Waste Oil
usage limit: 86.98 (tons/yr) / 110.25 (lbs/10³ gal) * 2000 (lbs/ton) = **1577.88 kgal/yr**
natural gas fuel equivalence: 0.6 (lbs/10⁶ scf) natural gas / 110.25 (lbs/10³ gal) waste oil = 0.005 kgal waste oil/ 10⁶ scf natural gas

SO₂ emissions from the combustion of 1 MMcf of natural gas are equivalent to the amount of SO₂ emissions created by the combustion of 0.005 kgal of re-refined waste oil.

No.2 fuel oil fuel equivalence: 69.1 (lbs/10³ gal) No.2 fuel oil / 110.25 (lbs/10³ gal) waste oil = 0.63 kgal waste oil/ No. 2 fuel oil

SO₂ emissions from the combustion of 1 kgal of No. 2 fuel oil are equivalent to the amount of SO₂ emissions created by the combustion of 0.63 kgal of waste oil.

*natural gas usage is not limited here because potential SO₂ emissions from this unit are less than 86.98 tons per year when burning this fuel

****HCl****

HCl emissions from the aggregate dryer/burner shall be limited to 6.82 tons per year (24 tons per year combined HAP limit - 17.18 tons per year of other HAPs) as follows:

Re-refined Waste Oil
usage limit: 6.82 (tons/yr) / 13.20 (lbs/10³ gal) * 2000 (lbs/ton) = **1033.33 kgal/yr**

25 tons per year for the combination of HAPs, the usage of re-refined waste oil shall be limited to 1033.33 kgal/yr as shown above. Compliance with this limit will restrict emissions of HCl, total HAPs, and SO₂ to below major source levels.

*****Aggregate Dryer/Burner: Limited and Controlled*****

The following calculations indicate the potential emissions from fuel combustion in the aggregate dryer/burner after application of the fuel usage limits calculated on the previous page and control of PM/PM-10 emissions by the one (1) baghouse with a primary dust collector, which has a control efficiency of 99.92%.

	<u>Emissions</u>	<u>Worst-case Fuel</u>
PM =	0.03 tons/yr	Re-refined Waste Oil
PM-10 =	0.02 tons/yr	Re-refined Waste Oil
SO ₂ =	86.98 tons/yr	No. 2 Fuel Oil
NO _x =	92.70 tons/yr	Natural Gas
VOCs =	1.82 tons/yr	Natural Gas
CO =	27.81 tons/yr	Natural Gas
HCl =	6.82 tons/yr	Re-refined Waste Oil

Natural Gas

The following calculations determine the emissions created by natural gas combustion, based on 8760 hours of operation and US EPA's AP 42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ⁶ scf)	Potential to Emit (tons/yr)
PM*	1.9	5.03E-04
PM-10*	7.6	2.01E-03
SO ₂	0.6	0.20
NO _x	280.0	92.70
VOCs	5.5	1.82
CO	84.0	27.81

*PM emission factor is filterable PM only; PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Fuel Usage Limit = 662.13 lbs/10⁶ scf
 Control Efficiency = 99.92%

Potential to Emit PM/PM-10 = Fuel Usage Limit (10⁶ scf/yr) * Ef (lb/10⁶ scf) * (1 ton/ 2000 lbs) * (1 - Control Efficiency)
 Potential to Emit all other pollutants = Fuel Usage Limit (10⁶ scf/yr) * Ef (lb/10⁶ scf) * (1 ton/ 2000 lbs)

No. 2 Fuel Oil

The following calculations determine the emissions created by the combustion of No. 2 fuel oil at 0.44 % sulfur, based on 8760 hours of and US EPA's AP 42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-3.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
PM*	2.0	2.01E-03
PM-10*	3.3	3.32E-03
SO ₂	69.1	86.98
NO _x	24.0	30.22
VOCs	0.2	0.25
CO	5.0	6.30

*PM emission factor is filterable PM only; PM-10 emission factor is filterable and condensible PM-10 combined.

Methodology:

Fuel Usage Limit = 2518.27 kgal/yr
 Control Efficiency = 99.92%

Potential to Emit PM/PM-10 = Fuel Usage Limit (kgal/yr) * Ef (lb/10³ gal) * (1 ton/ 2000 lbs) * (1 - Control Efficiency)
 Potential to Emit all other pollutants = Fuel Usage Limit (kgal/yr) * Ef (lb/10³ gal) * (1 ton/ 2000 lbs)

Re-refined Waste Oil

The following calculations determine the emissions created by the combustion of re-refined waste oil at 0.75 % sulfur, and 0.947 % ash, based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, and 1.11-3.

Criteria Pollutant	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
PM	60.61	0.03
PM-10	48.30	0.02
SO ₂	110.25	56.96
NO _x	19.00	9.82
VOCs	1.00	0.52
CO	5.00	2.58

Methodology:

Fuel Usage Limit = 1033.33 kgal/yr
 Control Efficiency = 99.92%

Potential to Emit PM/PM-10 = Fuel Usage Limit (kgal/yr) * Ef (lb/10³ gal) * (1 ton/ 2000 lbs) * (1 - Control Efficiency)
 Potential to Emit all other pollutants = Fuel Usage Limit (kgal/yr) * Ef (lb/10³ gal) * (1 ton/ 2000 lbs)

The following table indicates the amount of lead and hydrogen chloride (HCl) emissions created by re-refined waste oil combustion at 0.0072 % lead and 0.2 % chlorine. Emissions are based on 8760 hours of use and US EPA's AP 42, 5th Edition, Section 1.11 - Waste Oil Combustion, Table 1.11-1.

HAP	Emission Factor (Ef) (lbs/10 ³ gal)	Potential to Emit (tons/yr)
Lead	0.396	0.0002
HCl	13.20	6.82
Total (tons/yr) =		6.82

Methodology:

Control Efficiency = 99.92%

Potential to Emit Lead (tons/yr) = Limited and Controlled = Ef (lbs/10³ gal) * Re-refined Waste Oil Usage Limit (1033.33 kgal/ yr) * (1 ton/ 2000 lbs) * (1 - Control Efficiency)
 Potential to Emit HCl (tons/yr) = Limited = Ef (lbs/10³ gal) * Re-refined Waste Oil Usage Limit (1033.33 kgal/ yr) * (1 ton/ 2000 lbs)

Miscellaneous

40 CFR 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Plants) Compliance

The following calculations determine the source's ability to comply with 40 CFR Part 60.90, Subpart I, which limits PM emissions from asphalt plant stack to 0.04 gr/dscf:

$$44.39 \text{ (tons/yr)} * 2000 \text{ (lbs/ton)} * 7000 \text{ (gr/lb)} * (1 \text{ yr/ } 525,600 \text{ min}) * (1 \text{ min/ } 45,056.25 \text{ dscf}) = 0.026 \text{ gr/dscf (can comply)}$$

Pursuant to this NSPS, PM emissions from the aggregate dryer/burner cannot exceed 67.66 tons/yr, which is equivalent to 15.45 lbs/hr.

Compliance with this emission limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

Methodology:

PM emissions from aggregate dryer/burner after controls = 44.39 tons/yr
dscf = SCFM
SCFM = Standard Cubic Feet per Minute
ACFM = Actual Cubic Feet per Minute
SCFM = $59,307 \text{ ACFM} * (460 + 68) / (460 + 235)$
PM emission limit (tons/yr) = $0.04 \text{ (gr/dscf)} * 45,056.25 \text{ (dscf/min)} * 525,600 \text{ (min/yr)} * (1 \text{ lb/ } 7000 \text{ gr}) * (1 \text{ ton/ } 2000 \text{ lbs})$

326 IAC 2-2 Compliance; PM

Source-wide emissions of PM must be less than 250 tons per year to render the requirements of 326 IAC 2-2 (PSD) not applicable. Therefore, PM emissions from the aggregate dryer/burner shall be limited as follows:

$$\begin{aligned} 249.0 \text{ tons/yr (PM emission limit for entire source)} - 60.31 \text{ tons/yr (total PM emissions from all emission sources other than the aggregate} \\ \text{dryer/burner, after controls)} \\ = 188.69 \text{ tons PM/yr} \\ 188.69 \text{ (tons/yr)} * (2000 \text{ lbs/ ton)} * (1 \text{ yr/ } 8760 \text{ hr}) = 43.08 \text{ lbs/hr} \end{aligned}$$

Assuming the source operates at maximum capacity (450 tons of asphalt per hour) for 8760 hours per year, this emission limit is equivalent to 0.096 pound PM per ton of asphalt mix.

Because PM emissions from the aggregate dryer are controlled to 44.39 tons/yr (10.13 lbs/hr), which is less than 188.69 tons per year, the source is able to comply with this limit when using a control device.

326 IAC 2-8-4 Compliance; PM-10

Pursuant to 326 IAC 2-8-4, the source's potential to emit PM-10 shall be limited to less than 100 tons per year. PM-10 emissions are therefore limited as follows:

$$\begin{aligned} 99.0 \text{ tons/yr (PM-10 emission limit for entire source)} - 16.15 \text{ tons/yr (total PM-10 emissions from all emission units other than the aggregate} \\ \text{dryer/burner, after controls)} \\ = 82.85 \text{ tons PM-10/yr} \\ 82.85 \text{ (tons/yr)} * (2000 \text{ lbs/ ton)} * (1 \text{ yr/ } 8760 \text{ hr}) = 18.92 \text{ lbs/hr} \end{aligned}$$

Assuming the source operates at maximum capacity (450 tons of asphalt per hour) for 8760 hours per year, this emission limit is equivalent to 0.042 pound PM-10 per ton of asphalt mix.

Because PM-10 emissions from the aggregate dryer are controlled to 10.44 tons/yr (2.38 lbs/hr), which is less than 82.85 tons per year, the source is able to comply with this limit when using a control device.

*****Miscellaneous***
(continued)**

326 IAC 6-3-2 Compliance

Pursuant to 326 IAC 6-3-2, the emission limit for processing 450 tons/hr (900,000 lbs/hr) of hot mix asphalt is calculated as:

$$E = 55 * (P^{0.11}) - 40 \quad \text{where:} \quad \begin{array}{l} E = \text{Rate of emission in pounds per hour} \\ P = \text{Process weight rate in tons per hour} \end{array}$$

Therefore, the allowable PM emission rate is 67.7 lbs/hr ($55.0 * (450^{0.11}) - 40$). This is equivalent to 296.53 tons/yr of asphalt mix, assuming 8760 hours of source operation.

Since the PM emission limit pursuant to Subpart I of 15.45 lbs/hr is more stringent than this limit of 67.7 lbs/hr, the source is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 7 Compliance

Pursuant to 326 IAC 7, SO₂ emissions from fuel combustion in the aggregate dryer/burner shall be limited to 0.5 lb/MMBtu for distillate oil combustion. The AP 42 emission factor for SO₂ with a 0.44% sulfur content is 69.1 lbs/kgal. As demonstrated below, the source is able to comply with this limit given that the No. 2 fuel oil combusted has a sulfur content of no more than 0.44%.

$$69.1 \quad (\text{lbs/kgal}) * (1 \text{ kgal} / 140 \text{ MMBtu}) = 0.494 \quad \text{lbs/MMBtu}$$

Pursuant to 326 IAC 7, SO₂ emissions from fuel combustion emission units shall be limited to 1.6 lbs/MMBtu for residual oil combustion. The AP 42 emission factor for SO₂ with a 0.75% sulfur content is 110.25 lbs/kgal. As demonstrated below, the source is able to comply with this limit, given that the fuel combusted has a maximum sulfur content of 0.75%.

$$110.25 \quad (\text{lbs/kgal}) * (1 \text{ kgal} / 120 \text{ MMBtu}) = 0.919 \quad \text{lbs/MMBtu}$$

Though the Permittee has requested a 0.75% limit on the sulfur content of the re-refined waste oil combusted in the aggregate dryer/burner, they are able to comply with this rule as long as the sulfur content of the re-refined waste oil combusted does not exceed 1.3%:

$$191.1 \quad (\text{lbs/kgal}) * (1 \text{ kgal} / 120 \text{ MMBtu}) = 1.593 \quad \text{lbs/MMBtu}$$