



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: July 21, 2008

RE: Brooks Construction Company, Inc. / 003-26269-05190

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



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Mr. John Brooks
Brooks Construction Company, Inc.
2625 Ardmore Ave.
Ft Wayne, IN 46899

July 21, 2008

Re: F 003-26269-05190
Third Significant Revision to
F 003-19156-05190

Dear Mr. Brooks:

Brooks Construction Company, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F003-19156-05190 on September 1, 2004 for a portable drum mix asphalt plant located at 10000 Diebold Rd, Ft Wayne, IN 46825. On March 17, 2008, the Office of Air Quality (OAQ) received an application from the source requesting that the sulfur and chlorine content limitations for the waste oil be revised. The source has requested that crushing activities and additional materials (limestone, sand, and gravel) be added in to the potential emissions calculations to increase operational flexibility and ensure compliance with their FESOP PM and PM₁₀ limitations. Furthermore, the source has requested that the cold mix asphalt be removed from the permit, since cold mix asphalt has never been produced using this portable drum mix asphalt plant. Finally, the source has requested that the FESOP Renewal permit term be extended to ten (10) years. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(g)(2). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely/Original Signed By:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/hld

cc: File - Allen County
Allen County Health Department
U.S. EPA, Region V

Air Compliance Section
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Brooks Construction Company, Inc. (Portable)

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

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

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

Operation Permit No.: F003-19156-05190	
Issued by: Original Signed By: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: September 1, 2004 Expiration Date: September 1, 2014

First Significant Permit Revision No.: 003-21825-05190, issued January 20, 2006

First Relocation No.: 085-23320-05190, issued July 28, 2006

Second Relocation No.: 085-24826-05190, issued June 13, 2007

Second Significant Permit Revision No.: 003-24426-05190, issued July 11, 2007

Third Significant Permit Revision No.: 003-26269-05190	Pages affected: Entire permit
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2008 Expiration Date: September 1, 2014

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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) and any local air pollution control agency having jurisdiction over the source. 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 portable drum mix asphalt plant and portable concrete crusher.

Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
General Source Phone: (260) 478-1990
SIC Code: 2951
County: Kosciusko
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) asphalt parallel flow drum mixer/dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 120 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner, using refinery blend fuel oil or waste oil as a back-up fuel, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S/V-1);
- (b) One (1) concrete crusher, with a maximum capacity of less than one hundred fifty (150) tons per hour and a limited potential throughput of 50,000 tons per twelve (12) consecutive month period. [326 IAC 6-5]
- (c) One (1) 30,000 gallon liquid asphalt storage tank (ID No. Tank 10), constructed in 1989.

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

This portable source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight including:
 - (1) One (1) hot oil heater, with a maximum rated capacity of 0.7 MMBtu per hour, exhausting through one (1) stack (ID No. S/V-2).
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (d) Other categories with emissions below insignificant thresholds:
- (1) Cutting, welding, and grinding operations for repair and maintenance only;
 - (2) One (1) 8,000 gallon fuel oil storage tank (ID No. Tank 11);
 - (3) One (1) drag slat conveyor;
 - (4) One (1) cold feed system consisting of four (4) compartments with a total aggregate holding capacity of 100 tons;
 - (5) One (1) hot mix storage silo with a maximum storage capacity of 100 tons; and
 - (6) One (1) recycled asphalt pavement (RAP) feed bin with a maximum holding capacity of 25 tons.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit (F003-19516-05190) 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, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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 Local Air Pollution Control Agencies

- (a) If the Permittee seeks to relocate the portable plant to an area under the jurisdiction of any applicable Local Air Pollution Control Agency (LAPCA), the LAPCA may enact additional air pollution control requirements. The Permittee shall notify the applicable LAPCA when relocating to or from a LAPCA (See Condition C.21 for portable source relocation requirements).

- (b) The Local Air Pollution Control Agencies are:

Anderson
Jurisdiction: Madison County

City of Anderson, Air Management Division
P.O. Box 2100
120 East 8th Street
Anderson, IN 46018
Telephone Number: 765-648-6158
Facsimile Number: 765-648-5924

Evansville
Jurisdiction: City of Evansville plus four (4) miles beyond the corporate limits but not outside Vanderburgh County

Evansville EPA
D.K. Newsome Community Center
100 East Walnut Street, Suite 100
Evansville, IN 47713
Telephone Number: 812-435-6145
Facsimile Number: 812-435-6155

Gary
Jurisdiction: City of Gary

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, IN 46402
Telephone Number: 219-882-3000
Facsimile Number: 219-882-3012

Hammond
Jurisdiction: City of Hammond

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

Indianapolis
Jurisdiction: Marion County

Office of Environmental Services
Administration Building
2700 South Belmont Avenue
Indianapolis, IN 46221
Telephone Number: 317-327-2237
Facsimile Number: 317-274-2274

Vigo County
Jurisdiction: Vigo County

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807
Telephone Number: 812-462-3433
Facsimile Number: 812-462-3447

B.5 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit).

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

- (a) The Permittee shall furnish to IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), within a reasonable time, any information that IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit) 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.10 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.11 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 in letter form 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, 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.12 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit). IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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.13 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.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.15 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.16 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 Provision), 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.17 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.18 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 any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), any additional information identified as being needed to process the application.

B.19 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

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.20 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.21 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.22 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.23 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

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, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions 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), and 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] [326 IAC 2-2]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit of particulate matter (PM), from the entire source shall be limited to less than 250 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 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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(3)]

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 July 8, 2008. 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, 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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 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, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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, or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), may extend the retesting deadline.

- (c) IDEM, OAQ, or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit) makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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.

- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit). The general public may request this information from the IDEM, OAQ and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit) under 326 IAC 17.1.

Portable Source Requirement

C.20 Relocation of Portable Sources [326 IAC 2-14-4]

- (a) Pursuant to 2-14-4 (Relocation), a portable source, operation, process, or emissions unit that has been issued a valid operating permit under this article may be issued an approval letter for relocation that authorizes operation of the source, operation, process, or emissions unit as follows:
- (1) The source submits a notification at least thirty (30) days prior to relocation.
 - (2) The commissioner shall approve or deny the relocation within thirty (30) days of receipt of the notification of the proposed relocation.
 - (3) The application submitted for a permit revision in accordance with 326 IAC 2-6.1-6, 326 IAC 2-7-12, or 326 IAC 2-8-11.1 shall satisfy the notification requirements of this section.

The commissioner shall not approve a relocation of a portable source, operation, process, or emissions unit, if the following applies:

- (1) The relocation would allow a violation of the national ambient air quality standards (NAAQS).
 - (2) The relocation would allow a violation of a prevention of significant deterioration (PSD) maximum allowable increase.
 - (3) The source is not in compliance with all applicable air pollution control rules.
 - (4) The relocation would adversely affect the public health.
- (b) This permit is approved for operation in all areas of Indiana except in extreme, severe, or serious nonattainment areas for ozone (at the time of this permit's issuance these areas were Lake, LaPorte, and Porter Counties). This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2, and Emission Offset requirements in 326 IAC 2-3. Prior to locating in any severe nonattainment area, the Permittee must submit a request and obtain a permit modification.
- (c) A request to relocate shall be submitted to IDEM, OAQ at least thirty (30) days prior to the intended date of relocation. This submittal shall include the following:
- (1) A list of governmental officials entitled to receive notice of application to relocate. IC 13-15-3-1
 - (2) A list of adjacent landowners that the Permittee will send written notice to not more than ten (10) days after submission of the request to relocate. IC 13-15-8

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

- (d) A "Relocation Site Approval" letter shall be obtained prior to relocating.
- (e) The Permittee shall also notify the applicable local air pollution control agency (LAPCA) when relocating to, or from, one the following (See Condition B.4 for LAPCA contact information):
 - (1) Madison County - (City of Anderson, Air Management Division)
 - (2) City of Evansville plus four (4) miles beyond the corporate limits but not outside Vanderburgh County - (Evansville EPA)
 - (3) City of Gary - (Gary Department of Environmental Affairs)
 - (4) City of Hammond - (Hammond Department of Environmental Management)
 - (5) Marion County - (City of Indianapolis Office of Environmental Services)
 - (6) Vigo County - (Vigo County Air Pollution Control)
- (f) A valid operation permit consists of this document and any subsequent "Relocation Site Approval" letter specifying the current location of the portable plant.

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 FACILITY OPERATION CONDITIONS

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

- (a) One (1) asphalt parallel flow drum mixer/dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 120 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner, using refinery blend fuel oil or waste oil as a back-up fuel, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S/V-1);

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

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

D.1.2 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the drum mixer/dryer shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf).

D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the drum mixer/dryer shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.4 Particulate Matter 10 Microns (PM10) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3][326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, PM10 emissions from the drum mixer/dryer shall be limited to 0.107 pounds per ton of asphalt mix produced. The annual asphalt produced in the drum mix dryer shall be limited to 1,475,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits, combined with the potential PM10 emissions from all other emission units at this source will limit the source-wide potential to emit of PM10 to less than 100 tons per year. Therefore, compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7 the (Part 70 rules), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset) (when located in a county that is nonattainment for PM10), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) (for PM2.5 emissions when located in a county that is nonattainment for PM2.5) not applicable.

D.1.5 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the drum mixer/dryer shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20% opacity or greater.

D.1.6 Sulfur Dioxide (SO₂) Emissions [326 IAC 7-1.1-1][326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 120 million Btu per hour burner for the aggregate dryer shall be limited to 0.5 pounds per million Btu heat input when using distillate oil.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 120 million Btu per hour burner for the aggregate dryer shall be limited to 1.6 pounds per million Btu heat input when using residual oil or waste oil.

- (c) Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.7 Fuel Oil Usage [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3]

Pursuant to 326 IAC 2-8-4(1), the following limits shall apply:

- (a) the sulfur content of the refinery blend fuel oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed 1.0 percent.
- (b) the sulfur content of the No. 2 distillate fuel oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed 0.5 percent.
- (c) the sulfur content of the waste fuel oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed 1.0 percent.
- (e) The usage of refinery blend fuel oil with a maximum sulfur content of 1.0% and refinery blend fuel oil equivalents in the 120 MMBtu/hr aggregate dryer burner shall not exceed 1,311,333 U.S. gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, so that SO₂ and NO_x emissions are each limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 will not apply. This limitation will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.
- (f) For purposes of determining compliance, the following shall apply:
- (1) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 523.3 gallons of refinery blend fuel oil based on SO₂ emissions and a maximum No. 2 distillate fuel oil sulfur content of 0.5% such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;
- (2) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 510.6 gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;
- (3) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 980.0 gallons of refinery blend fuel oil based on SO₂ emissions and a maximum waste oil sulfur content of 1.0% such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period; and
- (4) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 404.3 gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period.

D.1.8 Hydrogen Chloride (HCl) Emissions [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following shall apply:

- (a) the chlorine content of the waste oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed four tenths of a percent (0.40%) by weight.
- (b) the usage of waste oil in the 120 MMBtu per hour burner for the aggregate dryer shall be limited to 725,000 U.S. gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.9 Carbon Monoxide (CO) Emissions [326 IAC 2-8-4]

The annual asphalt produced in the drum mixer/dryer shall be limited to 1,475,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The CO emissions shall be limited to 0.130 pounds of CO per ton of asphalt produced.

Compliance with this limit, combined with the CO emissions from all of the other emission units at this source, will limit the source-wide potential to emit of CO to less than 100 tons per year, and render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.10 Particulate Matter (PM) [326 IAC 2-2]

Particulate matter (PM) emissions from the drum mixer/dryer shall be limited to 0.237 pound PM per ton of asphalt mix produced. The annual asphalt produced in the drum mixer/dryer shall be limited to 1,475,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits, combined with the potential PM emissions from all other emission units at this source will limit the source-wide potential to emit of PM to less than 250 tons per year, and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.11 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-3]

The annual asphalt produced in the drum mix dryer shall be limited to 1,475,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Volatile organic compound (VOC) emissions from the drum mixer/dryer shall be limited to 0.032 pounds of VOC per ton of asphalt mix produced. Combined with the annual asphalt production limit and the VOC emissions from the other emission units at this source, source-wide emissions of VOC will be limited to less than one hundred (100) tons per year. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7 (Part 70 rules), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-3 (Emission Offset) (when located in a county that is nonattainment for ozone) not applicable.

D.1.12 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.13 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.2, D.1.3, D.1.4, D.1.5, and D.1.10 the Permittee shall perform PM, PM10, and opacity testing utilizing Methods as approved by the Commissioner, at least once every five years from July 8, 2005, the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.14 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input when burning No. 2 distillate fuel oil and that the sulfur dioxide emissions do not exceed 1.6 pounds per million Btu heat input when burning refinery blend fuel oil or waste oil by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 120 MMBtu per hour burner for the aggregate dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

D.1.15 Hydrogen Chloride Emissions and Chlorine Content

The Permittee shall demonstrate that the chlorine content of the fuel used does not exceed four tenths of a percent (0.40%) by weight when operating on waste oil, by providing vendor analysis of fuel delivered accompanied by a vendor certification.

D.1.16 Particulate Matter (PM) and PM10

- (a) In order to comply with conditions D.1.2, D.1.3, D.1.4, D.1.5, and D.1.10, the baghouse for PM and PM10 control shall be in operation and control emissions at all times when the drum mixer/dryer is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.17 Visible Emissions Notations

- (a) Visible emission notations of the asphalt drum mixer/dryer baghouse 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.1.18 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the drum mixer/dryer, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 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.1.19 Baghouse Failure Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the 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 Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.20 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel usage of each type of fuel used in the 120 MMBtu per hour burner for the aggregate dryer per month since last compliance determination period and equivalent SO₂ and NO_x emissions;
 - (3) 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; and

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

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel 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) To document compliance with Condition D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) below shall be complete and sufficient to establish compliance with the HCl emission limits established in Condition D.1.8.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual waste oil usage per month since last compliance determination period;
 - (3) Fuel supplier certifications;
 - (4) The name of the fuel supplier; and
 - (5) A statement from the fuel supplier that certifies the chlorine content of the fuel oil.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of the monthly hot mix asphalt production. Records maintained shall be complete and sufficient to establish compliance with the hot mix asphalt production limits established in Condition D.1.9.
- (d) The Permittee shall maintain records sufficient to verify compliance with the procedures specified in condition D.1.14. Records shall be maintained for a period of five (5) years and shall be made available upon request by IDEM.
- (e) To document compliance with Condition D.1.17, the Permittee shall maintain a daily record of visible emission notations of the drum mixer/dryer baghouse 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).
- (f) To document compliance with Condition D.1.18, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the drum mixer/dryer. 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).
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.21 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.7 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).

- (b) A quarterly summary of the information to document compliance with Condition D.1.9 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 FACILITY OPERATION CONDITIONS

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

- (b) One (1) concrete crusher, with a maximum capacity of less than one hundred fifty (150) tons per hour and a limited maximum throughput of 50,000 tons per twelve (12) consecutive month period. [326 IAC 6-5]

(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.1.1 Particulate Matter (PM) [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the amount of concrete processed shall not exceed 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM emissions from the crusher shall not exceed 0.0054 pounds per ton of concrete processed.

Compliance with these limitations, combined with the limits and emissions from other emission units at this source will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

D.1.2 Particulate (PM10), and Carbon Monoxide (CO) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-3][326 IAC 2-1.1-5]

- (a) Pursuant to 326 IAC 2-8-4, the amount of concrete processed shall not exceed 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM10 emissions from the crusher shall not exceed 0.0024 pounds per ton of concrete processed.

Compliance with these limitations, combined with the limits and emissions from other emission units at this source, will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2 the Permittee shall keep records of the amount of concrete processed through the crusher. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.2.1(a), D.2.1(b), D.2.2(a), and D.2.2(b) shall be submitted to the addresses 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: Brooks Construction Company, Inc.
Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
FESOP No.: F003-19156-05190

**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**

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

**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: Brooks Construction Company, Inc.
Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
FESOP No.: F003-19156-05190

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

Source Name: Brooks Construction Company, Inc.
 Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
 Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
 FESOP No.: F003-19156-05190
 Facility: 120.0 MMBtu per hour burner for the aggregate dryer
 Parameter: Sulfur Dioxide (SO₂) and NO_x emissions
 Limit: The usage of refinery blend fuel oil with a maximum sulfur content of 1.0% and refinery blend fuel oil equivalents in the 120 MMBtu/hr aggregate dryer burner shall not exceed 1,311,333 U.S. gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, so that SO₂ and NO_x emissions are each limited to less than 100 tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Refinery Blend Fuel Oil & Equivalent Usage This Month (gallons)	Refinery Blend Fuel Oil & Equivalent Usage Previous 11 Months (gallons)	12 Month Total Refinery Blend Fuel Oil & Equivalent Usage (gallons)
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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

Source Name: Brooks Construction Company, Inc.
 Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
 Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
 FESOP No.: 003-19156-05190
 Facility: Aggregate Mixer/Dryer
 Parameter: Hot Mix Asphalt Production
 Limit: 1,475,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Production This Month (tons)	Production Previous 11 Months (tons)	12 Month Total Production (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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

Source Name: Brooks Construction Company, Inc.
 Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
 Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
 FESOP No.: 003-19156-05190
 Facility: Crusher
 Parameter: Concrete crushing
 Limit: 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Production This Month (tons)	Production Previous 11 Months (tons)	12 Month Total Production (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**

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

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

Source Name: Brooks Construction Company, Inc.
 Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
 Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
 FESOP No.: 003-19156-05190

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 "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: _____

Attach a signed certification to complete this report.

ATTACHMENT A

BROOKS CONSTRUCTION COMPANY, INC.

ASPHALT PLANT AND CONCRETE CRUSHING FUGITIVE DUST CONTROL PLAN

- (a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:
- Paved roads and parking lots:
- (1) Cleaning by vacuum sweeping on an as needed basis (monthly at a minimum);
 - (2) Power brooming while wet either from rain or application of water.
- 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 chip and seal the road surface and maintained 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) Minimize the vehicular distance between transfer points;
 - (2) Enclose the transfer points;
 - (3) Apply 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) Maintain vehicle bodies in a condition to prevent leakage;

- (3) Spray the aggregates with water;
 - (4) Maintain 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) Reduce free fall distance to a minimum;
 - (2) Reduce the rate of discharge of the aggregate;
 - (3) Spray the aggregate with water on an as needed basis.
- (g) Fugitive particulate matter (dust) emissions from material handling operations such as crushing, grinding, screening, and mixing shall be controlled by one or more the following measures:
- (1) wet suppression.
 - (2) enclosure of emission source with venting of emissions to a fabric filter.
- A copy of the (manufacturers) specification for the particulate matter collection system equipment (i.e. fabric filter, wet suppression system) used as a fugitive particulate matter emission control measure shall be appended to the Fugitive Dust Plan.
- (h) A site map of the current location and set-up for this portable source outlining the type and quantity of material handled at each process/operation/area, which has a potential to emit fugitive particulate matter, shall be appended to the Fugitive Dust Plan within 30 days of the most recent relocation date.

Last Updated: July 8, 2008

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document (ATSD) for a
Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Brooks Construction Company, Inc.
Source Location (initial):	5536 Hoagland Road, Poe, Indiana, 46745
Source Location (current):	10000 Diebold Rd, Ft Wayne, IN 46825
County:	Allen
SIC Code:	2951
Operation Permit No.:	F 003-19156-05190
Operation Permit Issuance Date:	September 1, 2004
Significant Permit Revision No.:	F 003-26269-05190
Permit Reviewer:	Hannah L. Desrosiers

On June 4, 2008, the Office of Air Quality (OAQ) had a notice published in The Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Brooks Construction Company, Inc. had applied for a Significant Permit Revision (SPR) to a Federally Enforceable State Operating (FESOP) Permit, to make certain changes at their existing source including; the revision of waste oil sulfur and chlorine content limitations, the addition of crushing activities and additional materials (limestone, sand, and gravel) to increase operational flexibility, the removal of unused cold mix asphalt operations, and an extension of their FESOP Renewal permit term. The notice also stated that the OAQ proposed to issue a FESOP SPR for this operation and provided information on how the public could review the proposed permit 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 should be issued as proposed.

Comments and Responses

On Wednesday, July 2, 2008, John Postma, on behalf of the residents of Oak Creek Estates/DuPont Estates located adjacent to the Brooks portable asphalt plant, submitted comments to IDEM, OAQ on the draft FESOP SPR.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**. The Table of Contents has been updated as necessary.

Comment 1:

During my gathering of petitions (I am a resident as well) I have spoken with frustrated residents who cannot even open the windows to their houses, and residents that have smoke residue from the asphalt plant on their homes. The smoke does not rise high enough but rather floats across and into the park. I believe the stack height should be increased by 200% to ensure that excessive ground level pollution does not adversely affect residents of Oak Creek Estates / DuPont Estates.

Response to Comment 1:

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO₂), particulate matter to a diameter of 10 microns (PM₁₀), particulate matter to a diameter of 2.5 microns (PM_{2.5}), nitrogen oxides

(NOX) and ground level ozone. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set low enough to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated.

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS.

Allen County is in attainment for all the NAAQS. Information about current and expected air pollution levels is available on IDEM's SmogWatch site at <http://www.in.gov> on the internet. The site is designed to provide Hoosiers with an easy-to-read forecast of air quality in their communities. The site provides information about ground-level ozone and particulate matter forecasts.

Brooks Construction Company, Inc. operates under, and is requesting a revision to, a Federally Enforceable State Operating Permit (FESOP). The FESOP limits emissions to less than the Part 70 permit thresholds and is issued to sources that would otherwise have to operate in accordance with the Part 70 permit requirements in 326 IAC 2-7. Emission limits are restrictions over a given period of time on the amount of a pollutant which may be emitted from a source into the outside air. These restrictions may also include limitations on a source's production or operation, such as limiting quantities of raw materials consumed, fuel combusted, hours of operation, or conditions which specify that the source must install and maintain controls that reduce emissions to a specified emission rate or to a specified efficiency level. Additionally, the source may be required to do stack testing, maintain records, and/or submit reports to demonstrate compliance with their FESOP limits. The Brooks Construction Company, Inc. FESOP includes; emission limitations for each of the NAAQS criteria pollutants based on annual asphalt production limitations, and asphalt dryer/mixer fuel input and fuel characteristic (such as sulfur and chlorine content) limitations, emissions testing (PM and PM10) for the asphalt dryer/mixer, emissions control device operation and monitoring requirements for the asphalt dryer/mixer, visible emissions limitations and monitoring requirements for the material handling and storage operations, fugitive dust control requirements as stated in the fugitive dust control plan submitted on July 8, 2008 included in Section C of the permit, and recordkeeping and quarterly reporting to document compliance with the production, fuel usage and fuel characteristic limitations and compliance monitoring requirements contained in Section D of the permit.

IDEM, OAQ believes these requirements are sufficient to control emissions from all areas of the plant. However, violations observed by an IDEM inspector would be evaluated by IDEM's Compliance Branch and Office of Enforcement, and the appropriate action would be initiated to ensure compliance with applicable permit conditions and State and Federal regulations.

IDEM, OAQ inspector Patrick Burton did not observe any stack emissions drifting into homes or trees during his inspection. Stack emissions that fall to ground level and cross the plant boundary would be considered a violation of the fugitive dust rules under 326 Indiana Administrative Code (IAC) 6-4. Any citizen observing a possible violation of the plant's permit should immediately file a complaint with IDEM. Citizens may make a complaint about any air pollution concern by contacting the following Allen County IDEM OAQ Compliance Inspector;

Patrick Burton, Environmental Manager
Indiana Department of Environmental Management
100 North Senate Avenue
MC-61-53 IGCN 1003
Indianapolis, IN 46204-2551
Ph: 260-433-4538
email: pburton@idem.in.gov

by submitting a complaint on line at <http://www.in.gov/idem/4174.htm>, by contacting IDEM's Complaint Coordinator at (800) 451-6027, extension 24464, or by sending a written complaint to IDEM, Attn: Complaint Coordinator, 100 North Senate Avenue, MC 50-03 IGCN 1313, Indianapolis, IN 46204-2251.

No change has been made to the permit as a result of this comment.

Comment 2:

Dust from the stacked (material storage) piles can be seen blowing into the park on windy days. Residents cannot even open the windows to their houses.

Response to Comment 2:

The dust problems that are described here would be considered fugitive dust, which is particulate matter that crosses the property boundary of a plant at ground level. These types of emissions are regulated under this source's permit and under 326 IAC 6-4 and 326 IAC 6-5. Condition C.7 of the permit requires the plant operator to follow the Asphalt Plant Site Fugitive Dust Control Plan, attachment A to the permit. The fugitive dust control plan requires the plant operator to control emissions from the aggregate stockpiles, on an as needed basis, by maintaining a minimum number and size of stockpiles, by applying asphalt coating around the stockpiles, by applying water around the stockpiles and/or by applying water on the stockpiles. The fugitive dust control plan also requires the plant operator to control emissions from the roads, parking lots, conveyors, and the transferring, transportation and loading of material. IDEM, OAQ believes these requirements are sufficient to control fugitive dust from all areas of the plant. However, violations observed by an IDEM inspector would be evaluated by IDEM's Compliance Branch and Office of Enforcement, and the appropriate action would be initiated to ensure compliance with applicable permit conditions and State and Federal regulations.

IDEM, OAQ will continue to inspect the plant to determine if the source is adequately controlling fugitive dust emissions and ensure compliance with its permit and Indiana regulations. Any citizen observing a possible violation of the plant's permit should immediately file a complaint with IDEM. Citizens may make a complaint about any air pollution concern by contacting the following Allen County IDEM OAQ Compliance Inspector;

Patrick Burton, Environmental Manager
Indiana Department of Environmental Management
100 North Senate Avenue
MC-61-53 IGCN 1003
Indianapolis, IN 46204-2551
Ph: 260-433-4538
email: pburton@idem.in.gov

by submitting a complaint on line at <http://www.in.gov/idem/4174.htm>, by contacting IDEM's Complaint Coordinator at (800) 451-6027, extension 24464, or by sending a written complaint to IDEM, Attn: Complaint Coordinator, 100 North Senate Avenue, MC 50-03 IGCN 1313, Indianapolis, IN 46204-2251.

IDEM, OAQ's Compliance Inspector will respond to any citizen complaints of visible emissions, fugitive dust, or other air pollution concern regarding the facility by doing a complaint inspection. In every inspection, whether the result of a complaint or not, the IDEM OAQ compliance inspector will monitor the facility to determine if it is complying with the permit. The inspector prepares a written report of each inspection. Copies of inspection reports can be obtained by contacting IDEM, OAQ's Compliance Branch at 1-800-452-6027, ext. 3-0178.

Comment 3:

The fugitive dust plan is inadequate and outdated (over 10 years old) and is not adequately controlling fugitive dust emissions. Additionally, the plan does not indicate pollution control measures for the crushing operation.

Response to Comment 3:

Indiana Administrative Code 326 IAC 6-4 and 6-5, otherwise known as the fugitive dust rules, require that the permit for this source include a fugitive dust control plan addressing emissions from all points within the source to prevent particulate matter from escaping beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, and that the source then comply with all conditions and practices contained therein. Prior to this revision, the fugitive dust control plan approved in the September 2004 permit renewal contained all of the control measures required to control fugitive emissions for the existing asphalt plant.

IDEM, OAQ agrees that the addition of the new crushing operations necessitates a revision to the existing fugitive dust control plan. The permit and fugitive dust control plan have been revised as follows;

- (a) Section C.7 Fugitive Particulate Matter Emission Limitations, page 19 of 43 of the permit, has been revised to indicate the date that an updated fugitive dust control plan was received and approved, as follows;

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 11, 1996~~ **July 8, 2008**. The plan is included as Attachment A.

- (b) The Fugitive Dust Control Plan, Attachment A, pages 42 and 43 of 43, has been revised to include an appropriate description of the measures to be implemented to control fugitive particulate matter emissions resulting from the newly added crushing operations, as required by 326 IAC 6-5-5 (a)(8), as follows:

ATTACHMENT A

BROOKS CONSTRUCTION COMPANY, INC.

ASPHALT PLANT AND CONCRETE CRUSHING FUGITIVE DUST CONTROL PLAN

...

- (g) **Fugitive particulate matter (dust) emissions from material handling operations such as crushing, grinding, screening, and mixing shall be controlled by one or more the following measures:**
 - (1) **wet suppression.**
 - (2) **enclosure of emission source with venting of emissions to a fabric filter.**

A copy of the (manufacturers) specification for the particulate matter collection system equipment (i.e. fabric filter, wet suppression system) used as a fugitive particulate matter emission control measure shall be appended to the Fugitive Dust Plan.

- (h) A site map of the current location and set-up for this portable source outlining the type and quantity of material handled at each process/operation/area, which has a potential to emit fugitive particulate matter, shall be appended to the Fugitive Dust Plan within 30 days of the most recent relocation date.**

Last Updated: July 8, 2008

Comment 4:

This asphalt plant, being operated by Brooks Construction, should have never been placed in such close proximity to a residential area. I believe that Brooks dust emissions operations are in too close of proximity to the residential area of Oak Creek Estates / DuPont Estates to allow for adequate dispersion of pollution.

Response to Comment 4:

Local governmental subunits are charged with regulating land use. This regulation is done by zoning, planning, and construction regulations. IDEM, OAQ does not have the authority to regulate plant locations in any geographical area.

No change has been made to the permit as a result of this comment.

Comment 5:

I believe that Brooks Construction should not be granted a permit extension from 5 years to 10 years since it is a portable, temporary operation.

Response to Comment 5:

IDEM has determined that this portable source, as defined in 326 IAC 2-1.1-1(15), does not meet the definition of a temporary operation, as defined in 326 IAC 2-1.1-3(h)(3). On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing sources, including portable sources, eligible for or having received a permit renewal to extend their permit term to ten (10) years. Therefore, since Brooks Construction has been operating under a FESOP renewal since September 2004, pursuant to 326 IAC 2-1.1-9.5(b)(2) they qualify for the extension.

No change has been made to the permit as a result of this comment.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit. Since the OAQ prefers that all Technical Support Documents (TSDs) reflect the permit that was on public notice, no change will be made to the original TSD, or Appendix A of the TSD. This addendum is being used to document the indicated revisions as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

Concrete crushing operations were inadvertently added to the asphalt plant section of the permit as part of its material handling. Since the concrete crushing operations are unrelated, these activities are correctly being addressed separately, as shown in this addendum and appendix A of this addendum.

1. Calculations, showing the potential and limited fugitive emissions from the concrete crushing operations separated from the asphalt plant fugitive emissions, are depicted in appendix A of this addendum.
2. The source description in Section A.1 - General Information, page 5 of 43 of the Permit, has been revised to include the newly added portable concrete crusher, as follows;

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

The Permittee owns and operates a portable drum mix asphalt plant **and portable concrete crusher**.

...

3. Section A.2 - Emission Units and Pollution Control Equipment Summary, page 5 of 43 of the Permit, has been revised to include a description of the newly added concrete crushing operations and the existing descriptions have been renumbered accordingly, as follows;

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

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

...

(b) One (1) concrete crusher, with a maximum capacity of less than one hundred fifty (150) tons per hour and a limited maximum throughput of 50,000 tons per twelve (12) consecutive month period. [326 IAC 6-5]

(c) One (1) 30,000 gallon liquid asphalt storage tank (ID No. Tank 10), constructed in 1989.

...

4. Section B.11 - Annual Compliance Certification, page 9 of 43 of the permit, has been revised to adjust the report submission date from April 15 to July 01, as follows;

B.11 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 in letter form no later than **July 1 ~~April 15~~ of each year to:**

...

5. Section D.2 - Facility Operation Conditions, page 33 of 43 of the Permit, has been revised to include the accompanying applicable requirements for the newly added concrete crushing operations, as follows;

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) concrete crusher, with a maximum capacity of less than one hundred fifty (150) tons per hour and a limited potential throughput of 50,000 tons per twelve (12) consecutive month period. [326 IAC 6-5]

(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.1.1 Particulate Matter (PM) [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the amount of concrete processed shall not exceed 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM emissions from the crusher shall not exceed 0.0054 pounds per ton of concrete processed.

Compliance with these limitations, combined with the limits and emissions from other emission units at this source will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

**D.1.2 Particulate (PM10), and Carbon Monoxide (CO) [326 IAC 2-8-4] [326 IAC 2-2]
[326 IAC 2-3][326 IAC 2-1.1-5]**

- (a) Pursuant to 326 IAC 2-8-4, the amount of concrete processed shall not exceed 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM10 emissions from the crusher shall not exceed 0.0024 pounds per ton of concrete processed.

Compliance with these limitations, combined with the limits and emissions from other emission units at this source, will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2 the Permittee shall keep records of the amount of concrete processed through the crusher. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.2.1(a), D.2.1(b), D.2.2(a), and D.2.2(b) shall be submitted to the addresses 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).

...

6. The following FESOP Quarterly Report, page 39 of 43 of the Permit, has been added. The reporting form will aid Brooks Construction Company, Inc. in tracking the amount of concrete processed through the crusher on a quarterly basis and help ensure compliance with the maximum allowable throughput over a twelve (12) consecutive month period.

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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

Source Name: Brooks Construction Company, Inc.
Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
FESOP No.: 003-19156-05190
Facility: Crusher
Parameter: Concrete crushing
Limit: 50,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ **YEAR:** _____

Month	Column 1	Column 2	Column 1 + Column 2
	Throughput this Month (tons)	Throughput Previous 11 Months (tons)	12 Month Total Throughput (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.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

ATSD Appendix A: Emissions Calculations
Unlimited Potential Emissions
Summary

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Asphalt Plant Maximum Capacity

Maximum Hourly Asphalt Production =	400	ton/hr								
Maximum Annual Asphalt Production =	3,504,000	ton/yr								
Maximum Fuel Input Rate =	120	MMBtu/hr								
Equivalent No. 2 Fuel Oil Usage =	7,508,571	gal/yr, and	0.50	% sulfur						
Refinery Blend (No. 2 and No. 6) Fuel Oil Limitation =	7,508,571	gal/yr, and	1.00	% sulfur						
Equivalent Used/Waste Oil Usage =	7,508,571	gal/yr, and	1.00	% sulfur	0.65	% ash	0.400	% chlorine,	0.040	% lead

Unlimited/Uncontrolled Emissions

Process Description	Unlimited/Uncontrolled Potential to Emit (tons/year)								
	Criteria Pollutants						Hazardous Air Pollutants		
	PM	PM10	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Case HAP	
Ducted Emissions									
Fuel Combustion (worst case)	156.18	124.45	563.14	176.45	3.75	18.77	108.95	99.11	(hydrogen chloride)
Dryer/Mixer	49,056.00	11,388.00	101.62	96.36	56.06	227.76	18.68	5.43	(formaldehyde)
Worst Case Emissions	49,056.00	11,388.00	563.14	176.45	56.06	227.76	108.95	99.11	(hydrogen chloride)
Fugitive Emissions									
Asphalt Load-Out and On-Site Yard	0.91	0.91	0	0	8.66	2.98	0.18	0.04	(formaldehyde)
Hot Oil System	0	0	0	0	5.8E-04	0.03	5.8E-04	3.7E-04	(naphthalene)
Material Storage Piles	1.92	0.67	0	0	0	0	0	0	
Material Processing and Handling	19.85	9.42	0	0	0	0	0	0	
Material Crushing, Screening, and Conveying	77.53	28.33	0	0	0	0	0	0	
Unpaved Roads	78.96	20.12	0	0	0	0	0	0	
Gasoline Dispensing	0	0	0	0	4.34	0	1.13	0.39	(xylenes)
Volatile Organic Liquid Storage Vessels	0	0	0	0	negl.	0	negl.	negl.	
Total Fugitive Emissions	179.17	59.45	0	0	13.00	3.01	1.31	0.39	(xylenes)
Totals Unlimited/Uncontrolled PTE	49,235.17	11,447.45	563.14	176.45	69.06	230.77	110.26	99.11	(xylenes)

negl = negligible

**ATSD Appendix A: Emissions Calculations
Unlimited Potential Fugitive Emissions
Material Processing and Handling**

Company Name: Brooks Construction Company, Inc.
 Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
 Permit Number: 003-19156-05190
 Revision No.: 003-26269-05190
 Reviewer: Hannah L. Desrosiers
 Submitted: March 17, 2008

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^k \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission factor (lb/ton)
 k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
 k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
 U = 10.2 = worst case annual mean wind speed (Source: NOAA, 2006*)
 M = 4.0 = material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
 E_f (PM) = 2.27E-03 lb PM/ton of material handled
 E_f (PM10) = 1.07E-03 lb PM10/ton of material handled

Maximum Annual Asphalt Production = 3,504,000 tons/yr
 Percent Asphalt Cement/Binder (weight %) = 5.0%
 Maximum Material Handling Throughput = 3,328,800 tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	3.77	1.78
Front-end loader dumping of materials into feeder bins	3.77	1.78
Conveyor dropping material into dryer/mixer or batch tower	3.77	1.78
Total (tons/yr)	11.32	5.35

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]

Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Raw materials may include limestone, sand, recycled asphalt pavement (RAP), gravel, slag, and other additives

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2006

Material Screening and Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from raw material crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	8.99	3.99
Screening	0.025	0.0087	41.61	14.48
Conveying	0.003	0.0011	4.99	1.83
Limited Potential to Emit (tons/yr) =	46.60	55.59	16.31	20.31

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]

Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]

Raw materials may include stone/gravel, slag, and recycled asphalt pavement (RAP)

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

Notes

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (Table 11.19.2-2). The bulk moisture content of aggregate in the storage piles at a hot mix asphalt production plant typically stabilizes between 3 to 5 percent by weight (Source: AP-42 Section 11.1.1.1).

**ATSD Appendix A: Emissions Calculations
Fugitive Dust from Concrete Crushing Operations
Material Processing and Handling**

Company Name: **Brooks Construction Company, Inc.**
 Source Address: **10,000 Diebold Road, Ft. Wayne, IN 46899**
 Permit Number: **003-19156-05190**
 Revision No.: **003-26269-05190**
 Reviewer: **Hannah L. Desrosiers**
 Submitted: **March 17, 2008**

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of concrete (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, updated 11/06) are utilized.

$$E_f = k \cdot (0.0032)^k \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
U =	10.2	= worst case annual mean wind speed (Source: NOAA, 2007*)
M =	2.5	= material % moisture content of concrete (Source: AP-42 Section 13.2.4-4)
E_f (PM) =	4.33E-03	lb PM/ton of material handled
E_f (PM10) =	2.05E-03	lb PM10/ton of material handled

Maximum Material Handling Throughput = **1,314,000** tons/yr

Type of Activity	Unlimited/ Uncontrolled PTE of PM (tons/yr)	Unlimited/ Uncontrolled PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	2.84	1.35
Front-end loader dumping of materials into feeder bins	2.84	1.35
Conveyor dropping material into crusher	2.84	1.35
Total (tons/yr)	8.53	4.04

Methodology

Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2007

Material Screening and Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from concrete crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/ Uncontrolled PTE of PM (tons/yr)	Unlimited/ Uncontrolled PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	3.55	1.58
Screening	0.025	0.0087	16.43	5.72
Conveying	0.003	0.0011	1.97	0.72
Limited Potential to Emit (tons/yr) =	21.94	8.02		

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

Methodology

Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

Notes

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (AP-42 Table 11.19.2-2).

ATSD Appendix A: Emissions Calculations
 Limited Emissions
 Summary

Company Name: Brooks Construction Company, Inc.
 Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
 Permit Number: 003-19156-05190
 Revision No.: 003-26269-05190
 Reviewer: Hannah L. Desrosiers
 Submitted: March 17, 2008

Asphalt Plant Limitations

Annual Asphalt Production Limitation =	1,475,000	ton/yr						
No. 2 Fuel Oil Limitation =	2,505,000	gal/yr, and	0.50	% sulfur				
Refinery Blend (No. 2 and No. 6) Fuel Oil Limitation =	1,311,333	gal/yr, and	1.00	% sulfur				
Used/Waste Oil Limitation =	725,000	gal/yr, and	1.00	% sulfur	0.65	% ash	0.400	% chlorine, 0.040 % lead
PM Dryer/Mixer Limitation =	0.237	lb/ton of asphlt production						
PM10 Dryer/Mixer Limitation =	0.107	lb/ton of asphlt production						
CO Dryer/Mixer Limitation =	0.130	lb/ton of asphlt production						
VOC Dryer/Mixer Limitation =	0.032	lb/ton of asphlt production						

Limited/Controlled Emissions

Process Description	Limited/Controlled Potential Emissions (tons/year)								
	Criteria Pollutants						Hazardous Air Pollutants		
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAP	
Ducted Emissions									
Fuel Combustion (worst case)	15.08	12.02	98.35	30.82	0.36	6.26	10.61	9.57	(hydrogen chloride)
Dryer/Mixer	174.79	78.91	42.78	40.56	23.60	95.88	7.86	2.29	(formaldehyde)
Worst Case Emissions	174.79	78.91	98.35	40.56	23.60	95.88	10.61	9.57	(hydrogen chloride)
Fugitive Emissions									
Asphalt Load-Out and On-Site Yard	0.38	0.38	0	0	3.65	1.25	0.08	0.02	(formaldehyde)
Hot Oil System	0	0	0	0	5.8E-04	0.03	5.8E-04	3.7E-04	(naphthalene)
Material Storage Piles	1.92	0.67	0	0	0	0	0	0	
Material Processing and Handling	4.94	2.33	0	0	0	0	0	0	
Material Crushing, Screening, and Conveying	19.46	6.83	0	0	0	0	0	0	
Unpaved Roads	33.23	8.47	0	0	0	0	0	0	
Gasoline Dispensing	0	0	0	0	4.34	0	1.13	0.39	(xylenes)
Volatile Organic Liquid Storage Vessels	0	0	0	0	negl.	0	negl.	negl.	
Total Fugitive Emissions	59.93	18.68	0	0	7.98	1.28	1.21	0.39	(xylenes)
Totals Limited/Controlled Emissions	234.72	97.59	98.35	40.56	31.58	97.16	11.82	9.57	(hydrogen chloride)

negl = negligible

If add unlimited crushing

PM	PM10
0.38	0.38
0	0
1.92	0.67
13.3	6.29
40.56	14.54
33.23	8.47
0	0
0	0
89.40	30.35
264.19	109.27

Need to add limit to permit...

**ATSD Appendix A: Emissions Calculations
Limited Fugitive Emissions
Material Processing and Handling**

Company Name: Brooks Construction Company, Inc.
 Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
 Permit Number: 003-19156-05190
 Revision No.: 003-26269-05190
 Reviewer: Hannah L. Desrosiers
 Submitted: March 17, 2008

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

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

where: Ef = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
U =	10.2	= worst case annual mean wind speed (Source: NOAA, 2005*)
M =	4.0	= material % moisture content of aggregate (Source: AP-42 Section 11.1.1.4)
Ef (PM) =	2.27E-03	lb PM/ton of material handled
Ef (PM10) =	1.07E-03	lb PM10/ton of material handled

Annual Asphalt Production Limitation =	1,475,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Material Handling Throughput =	1,401,250	tons/yr

Type of Activity	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	1.59	0.75
Front-end loader dumping of materials into feeder bins	1.59	0.75
Conveyor dropping material into dryer/mixer or batch tower	1.59	0.75
Total (tons/yr)	4.77	2.25

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]

Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Raw materials may include limestone, sand, recycled asphalt pavement (RAP), gravel, slag, and other additives

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2005

Material Screening and Conveying (AP-42 Section 19.2.2)

To estimate potential fugitive dust emissions from raw material crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 19.2.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	3.78	1.68
Screening	0.025	0.0087	17.52	6.10
Conveying	0.003	0.0011	2.10	0.77
Limited Potential to Emit (tons/yr) =			18.62	6.52

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]

Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]

Raw materials may include stone/gravel, slag, and recycled asphalt pavement (RAP)

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

Uncontrolled emission factors for PM and PM10 represent primary crushing of stone with moisture content ranging from 0.2% to 1.0 percent by weight (Table 11.19.2-2). The bulk moisture content of aggregate in the storage piles at a hot mix asphalt production plant

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PTE = Potential to Emit

**ATSD Appendix A: Emissions Calculations
Fugitive Dust from Concrete Crushing Operations
Material Processing and Handling**

Company Name: **Brooks Construction Company, Inc.**
 Source Address: **10,000 Diebold Road, Ft. Wayne, IN 46899**
 Permit Number: **003-19156-05190**
 Revision No.: **003-26269-05190**
 Reviewer: **Hannah L. Desrosiers**
 Submitted: **March 17, 2008**

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of concrete (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, updated 11/06) are utilized.

$$E_f = k \cdot (0.0032)^k \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter ≤ 100 μ m)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter ≤ 10 μ m)
U =	10.2	= worst case annual mean wind speed (Source: NOAA, 2007*)
M =	2.5	= material % moisture content of concrete (Source: AP-42 Section 13.2.4-4)
E_f (PM) =	4.33E-03	lb PM/ton of material handled
E_f (PM10) =	2.05E-03	lb PM10/ton of material handled

Maximum Material Handling Throughput = **50,000** tons/yr

Type of Activity	Unlimited/ Uncontrolled PTE of PM (tons/yr)	Unlimited/ Uncontrolled PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	0.11	0.05
Front-end loader dumping of materials into feeder bins	0.11	0.05
Conveyor dropping material into crusher	0.11	0.05
Total (tons/yr)	0.32	0.15

Methodology

Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2007

Material Screening and Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from concrete crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/ Uncontrolled PTE of PM (tons/yr)	Unlimited/ Uncontrolled PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	0.14	0.06
Screening	0.025	0.0087	0.63	0.22
Conveying	0.003	0.0011	0.08	0.03
Limited Potential to Emit (tons/yr) =			0.84	0.31

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 μ m) PTE = Potential to Emit

Methodology

Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

Notes

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (AP-42 Table 11.19.2-2).

ATSD Appendix A: Emissions Calculations
326 IAC 6-3-2(e) Allowable Rate of Emissions

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Unit ID	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Concrete Crusher	11,415.53	5.708	13.171	57.689

Methodology

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Brooks Construction Company, Inc.
Source Location (initial):	5536 Hoagland Road, Poe, Indiana, 46745
Source Location (current):	10000 Diebold Rd, Ft Wayne, IN 46825
County:	Allen
SIC Code:	2951
Operation Permit No.:	F 003-19156-05190
Operation Permit Issuance Date:	September 1, 2004
Significant Permit Revision No.:	F 003-26269-05190
Permit Reviewer:	Hannah L. Desrosiers

On March 17, 2008, the Office of Air Quality (OAQ) received an application from Brooks Construction Company, Inc. related to a modification to an existing portable drum mix asphalt plant.

Existing Approvals

The source was issued FESOP Renewal No. 003-19156-05190 on September 1, 2004. The source has since received the following approvals:

- (a) First Significant Permit Revision 003-21825-05190, issued on January 20, 2006;
- (b) First Relocation 085-23320-05190, issued on July 28, 2006;
- (c) Second Relocation 003-24826-05190, issued on June 13, 2007; and
- (d) Second Significant Permit Revision 003-24426-05190, issued on July 11, 2007.

County Attainment Status

The source is located in Allen County.

The following attainment status designations are applicable to Allen County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. <ul style="list-style-type: none"> • Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}. 	

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Allen County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants

Allen County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. However, prior to this revision, this existing source was already subject to an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

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Process/Emission Unit	Potential To Emit of the Entire Source prior to the Revision (tons/year)							
	PM	PM ₁₀ *	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Ducted Emissions								
Fuel Combustion (worst case) ⁽¹⁾	15.08	12.02	98.30	30.8	1.34	6.69	6.85	3.53 (hydrogen chloride)
Dryer/Mixer ⁽¹⁾	180.50	81.50	44.20	41.92	24.39	99.08	7.77	2.36 (formaldehyde)
Worst Case PTE	180.5	81.5	98.3	41.9	24.4	99.1	7.77	3.53 (hydrogen chloride)
Fugitive Emissions								
Asphalt Load-Out and On-Site Yard ⁽¹⁾	0	0	0	0	0	0	0	0
Hot Oil Heating System	0.04	0.07	1.55	0.44	0.01	0.11	0	0
Material Storage Piles	0.06	0.02	0	0	0	0	0	0
Material Screening, Conveying, Processing and Handling ⁽¹⁾	2.35	1.11	0	0	0	0	0	0
Cold Mix Asphalt ⁽¹⁾	0	0	0	0	75.0	0	0	0
Unpaved Roads ⁽¹⁾	63.1	16.1	0	0	0	0	0	0
Volatile Organic Liquid Storage Vessels **	0	0	0	0	negl.	0	negl.	negl.
Total Fugitive Emissions	65.5	17.3	1.5	0.4	75.0	0.1	0	0
Total PTE of Entire Source	246	98.8	99.9	42.4	99.4	99.2	7.77	3.53 (hydrogen chloride)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA
(1) PTE after Production Limitation. negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ** Fugitive emissions from each of the volatile organic liquid storage tanks were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.								

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) Portable Source

(1) Initial Location

This is a portable source and its current location is 10000 Diebold Rd, Ft Wayne, IN 46825.

(2) PSD and Emission Offset Requirements

This portable source is allowed to operate in all areas of Indiana except Lake County, Porter County, and in areas that are designated as extreme, severe, or serious non-attainment for any National Ambient Air Quality Standard. This determination is based on the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 2-3 (Emission Offset), 326 IAC 2-6 (Emission Reporting), 326 IAC 5-1 (Opacity Limitations), and 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Brooks Construction Company, Inc., on March 17, 2008, relating to the use of waste oil as a backup fuel in the dryer/mixer burner. The source has requested that the sulfur content limitation for the waste oil be revised from 0.50% to 1.0%, and the chlorine content limitation be revised from 0.11% to 0.40%. The source has requested that crushing activities and additional materials (limestone, sand, and gravel) be added in to the potential emissions calculations to increase operational flexibility and ensure compliance with their FESOP PM and PM₁₀ limitations. Furthermore, the source has requested that the cold mix asphalt be removed from the permit, since cold mix asphalt has never been produced using this portable drum mix asphalt plant. Finally, the source has requested that the FESOP Renewal permit term be extended to ten (10) years.

The following is a description of the affected emission unit(s) and pollution control device(s):

- (a) One (1) asphalt parallel flow drum mixer/dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 120 million (MM) British thermal units (Btu) per hour No. 2 distillate fuel oil fired burner, using refinery blend fuel oil or waste oil as a back-up fuel, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S/V-1);

Upon review of the permit, OAQ, in collaboration with the source, determined that the following additional revisions were required to maintain the Source's FESOP Status:

- (a) To accommodate the revision to the waste oil sulfur and chlorine content limitations, the hot mix asphalt production limit was adjusted to keep the PM₁₀ and Carbon Monoxide (CO) emissions below the Title V major source threshold of 100 tons per year.

Additionally, OAQ determined that the source's potential to emit calculations required reevaluation and revision for the following reasons:

- (a) Fugitive volatile organic compound (VOC), hazardous air pollutant (HAP), and particulate matter (PM) emissions from Silo Filling/Storage, Load Out, On-Site Yard, Gasoline Dispensing, and Storage Tanks were overlooked from the previous review and needed to be included in the source's potential to emit (PTE); and
- (b) Fugitive PM emissions for unpaved roads have been re-evaluated to clarify and better document source conditions.

Enforcement Issues

There are no pending enforcement actions related to this revision.

(1) PTE after Production Limitation.
 (2) Cold mix asphalt production is being removed from the source during this revision.
 negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
 ** Fugitive emissions from each of the volatile organic liquid storage tanks were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM ₁₀ *	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Ducted Emissions								
Fuel Combustion (worst case) ⁽¹⁾	15.08	12.02	98.35	30.82	0.36	6.26	10.61	9.57 (hydrogen chloride)
Dryer/Mixer ⁽¹⁾	174.79	78.91	42.78	40.56	23.60	95.88	7.86	2.29 (formaldehyde)
Worst Case PTE	174.79	78.91	98.35	40.56	23.60	95.88	10.61	9.57 (hydrogen chloride)
Fugitive Emissions								
Asphalt Load-Out and On-Site Yard ⁽¹⁾	0.38	0.38			3.65	1.25	0.08	0.02 (formaldehyde)
Hot Oil Heating System	0	0	0	0	5.8E-04	0.03	5.8E-04	3.7E-04 (naphthalene)
Material Storage Piles	1.92	0.67	0	0	0	0	0	0
Material Crushing, Screening, Conveying, Processing and Handling ⁽¹⁾	28.17	10.80	0	0	0	0	0	0
Unpaved Roads ⁽¹⁾	33.23	8.47	0	0	0	0	0	0
Gasoline Dispensing	0	0	0	0	4.34	0	1.13	0.39 (xylenes)
Volatile Organic Liquid Storage Vessels **	0	0	0	0	negl.	0	negl.	negl.
Total Fugitive Emissions	63.70	20.33	0	0	7.98	1.28	1.21	0.39 (xylenes)
Total PTE of Entire Source	238.49	99.24	98.35	40.56	31.58	97.16	11.82	9.57 (hydrogen chloride)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	NA	NA	NA	NA	NA	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA
(1) PTE after Production Limitation. negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ** Fugitive emissions from each of the volatile organic liquid storage tanks were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.								

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) Pursuant to 326 IAC 2-8-4, the SO₂ emissions from the dryer/mixer burner shall be limited as follows:

(A) The total usage of refinery blend fuel oil and refinery blend fuel oil equivalents for the dryer/mixer burner and all other fuel combustion equipment shall be limited to less than 1,311,333 gallons or equivalent per twelve (12) consecutive month period, with compliance determined at the end of each month.

For the purpose of determining compliance with this limit:

(i) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 523.3 gallons of refinery blend fuel oil based on SO₂ emissions and a maximum No. 2 distillate fuel oil sulfur content of 0.5% such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;

(ii) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 980.0 gallons of refinery blend fuel oil based on SO₂ emissions and a maximum waste oil sulfur content of 1.0% such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period; and

(B) The sulfur content of the refinery blend fuel oil and waste oil, each, shall not exceed 1.0% by weight.

(C) The sulfur content of the No. 2 fuel oil shall not exceed 0.5% by weight.

Compliance with these limits, combined with the SO₂ emissions from all other units at this source, will limit the source-wide SO₂ emissions to less than 100 tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (PSD) , and 326 IAC 2-3 (Emission Offset) not applicable.

See Appendix A for the detailed calculations.

(2) Pursuant to 326 IAC 2-8-4, the NO_x emissions from the dryer/mixer burner shall be limited as follows:

(A) The total usage of refinery blend fuel oil and refinery blend fuel oil equivalents for the dryer/mixer burner and all other fuel combustion equipment shall be limited to less than 1,311,333 gallons or equivalent per twelve (12) consecutive month period, with compliance determined at the end of each month.

For the purpose of determining compliance with this limit:

- (i) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 510.6 gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;
- (ii) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 404.3 gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period.

Compliance with these limits, combined with the NO_x emissions from all other units at this source, will limit source-wide NO_x emissions to less than 100 tons per twelve (12) consecutive month period. Compliance with these limits will render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.

See Appendix A for the detailed calculations.

- (3) Pursuant to 326 IAC 2-8-4, the emissions of PM₁₀, CO, and VOC from the dryer/mixer shall be limited as follows:
 - (A) The asphalt production rate shall be limited to less than 1,475,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (B) PM₁₀ emissions from the dryer/mixer shall be limited to less than 0.107 pounds of PM₁₀ per ton of asphalt produced.
 - (C) CO emissions from the dryer/mixer shall be limited to less than 0.130 pounds of CO per ton of asphalt produced.
 - (D) VOC emissions from the dryer/mixer shall be limited to less than 0.032 pounds of VOC per ton of asphalt produced.

Compliance with these limits, combined with the PM₁₀, CO, and VOC emissions from all other emission units at this source, will limit the source-wide PM₁₀, CO, and VOC emissions, each to less than 100 tons per 12 consecutive month period, and render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (PSD) , and 326 IAC 2-3 (Emission Offset) not applicable.

See Appendix A for the detailed calculations.

- (4) Pursuant to 326 IAC 2-8-4, the following additional limits shall apply to the source:
 - (A) The chlorine content of the waste oil used in the dryer/mixer burner and all other fuel combustion equipment shall not exceed four tenths of a percent (0.40%) by weight.
 - (B) The usage of waste oil used in the dryer/mixer burner and all other fuel combustion equipment shall be limited to less than 725,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (C) The HCl emissions from the dryer/mixer burner shall be limited to less than 26.4 pounds of HCl per 1,000 gallons of waste oil burned.

Compliance with these limits, combined with the HAP emissions from all other emission units at this source, will limit the source-wide HCl emissions to less than 10 tons per year and combined HAP emissions to less than 25 tons per year and render 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

See Appendix A for the detailed calculations.

- (b) PSD Minor Source
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The asphalt production rate shall be limited to less than 1,400,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) PM emissions from the dryer/mixer shall be limited to less than 0.237 pounds of PM per ton of asphalt produced.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, will limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

See Appendix A for detailed calculations.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants (40 CFR 60, Subpart OOO) (326 IAC 12), are not included in the permit. The source does not perform onsite crushing of Recycled Asphalt Pavement (RAP) and only receives pre-crushed/pre-sized RAP materials, therefore, pursuant to 40 CFR 60.670(a)(2) stand-alone screening operations at plants without crushers or grinding mills are exempt.

Additionally, while the source does perform crushing of concrete pavement, the maximum capacity of the crusher is less than 150 tons per hour and the material being crushed is not of a type defined in the subpart, therefore, pursuant to 40 CFR 60.670(c)(2) this activity is also exempt.

- (b) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision. The source shall continue to comply with the applicable federal requirements and permit conditions contained in FESOP Renewal No. 003-19156-05190.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will still be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HCl from burning waste oil in the dryer/mixer burner is greater than ten (10) tons per year. However, the source shall limit the potential to emit of HCl from the dryer/mixer to less than ten (10) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)
The dryer/mixer burner is subject to 326 IAC 7-1.1, because it has potential SO₂ emissions of greater than 25 tons per year (limited potential emissions are 99.0 tons per year). Pursuant to this rule, sulfur dioxide emissions from the dryer/mixer burner shall be limited to five-tenths (0.5) pounds per million Btu for distillate oil combustion (including No. 2 fuel oil) and one and six-tenths (1.6) pounds per million Btu heat input for residual oil (including refinery blend fuel oil and waste oil) combustion.
- (e) 326 IAC 8-1-6 (BACT)
The dryer/mixer has a limited potential to emit of 23.6 tons per year of VOC, based on a limited throughput of 1,475,000 tons per twelve (12) consecutive month period and a VOC limit of 0.032 pound of VOC per ton of hot mix asphalt produced. Compliance with these limits will render the requirements of 326 IAC 8-1-6 not applicable to the dryer/mixer.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP Renewal No. 003-19156-05190, issued September 1, 2004.

Proposed Changes

1. The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
 - (a) The expiration date on the cover page has been extended by five (5) years.
 - (b) Section A.2 has been revised to remove the cold mix asphalt stock pile from the source's listing of emission units and pollution control devices.
 - (c) Section B.2 has been revised to reflect the ten (10) year permit term.
 - (d) Sections D.1.4, D.1.9, D.1.10, and D.1.11 have been revised to reduce the hot mix asphalt production limit, to accommodate the revision to the waste oil sulfur and chlorine

content limitations and keep the PM₁₀ and Carbon Monoxide (CO) emissions below the Title V major source threshold of 100 tons per year.

- (e) Sections D.1.6(a) and D.1.6(b) have been revised to remove non-federally enforceable sulfur content limitations.
- (f) Sections D.1.7(c) and D.1.7(f)(3) have been revised to increase the sulfur content limit for the waste oil.
- (g) Sections D.1.7(f)(1) through D.1.7(f)(4) have been revised to include the maximum annual allowable fuel usage in gallons per twelve (12) consecutive month period.
- (h) Sections D.1.7(f)(3) and D.1.7(f)(4) have been revised to adjust the fuel equivalency for the waste oil in respect to the refinery blend fuel oil, due to the increased sulfur and chlorine limitations.
- (i) Section D.1.8 has been revised to increase the chlorine content limit, and reduce the fuel usage limit for the waste oil.
- (j) Section D.1.15 has been revised to increase the chlorine content limit.
- (k) Section D.2 had been deleted because cold mix asphalt since cold mix asphalt has never been produced using this portable drum mix asphalt plant.

All forms have been updated to reflect the new limits and the removal of the cold mix asphalt facilities.

The expiration date on the cover page has been extended by five (5) years as follows:

Issuance Date: December 7, 2007
Expiration Date: December 7, ~~2012~~ **2017**

...

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

...

~~(b) Cold mix (stockpile mix) asphalt storage piles; and~~

(be) One (1) 30,000 gallon liquid asphalt storage tank (ID No. Tank 10), constructed in 1989.

...

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

(a) This permit (F003-19516-05190) is issued for a fixed term of ~~five (5) 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.

...

D.1.4 Particulate Matter 10 Microns (PM10) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3][326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, PM10 emissions from the drum mixer/dryer shall be limited to 0.107 pounds per ton of asphalt mix produced. The annual asphalt produced in the drum mix dryer shall be limited to ~~1,524,240~~ **1,475,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits, combined with the potential PM10 emissions from all other emission units at this source will limit the source-wide potential to emit of PM10 to less than 100 tons per year. Therefore, compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7 the (Part 70 rules), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset) (when located in a county that is nonattainment for PM10), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) (for PM2.5 emissions when located in a county that is nonattainment for PM2.5) not applicable.

...

D.1.6 Sulfur Dioxide (SO₂) Emissions [326 IAC 7-1.1-1][326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 120 million Btu per hour burner for the aggregate dryer shall be limited to 0.5 pounds per million Btu heat input ~~or a sulfur content of less than or equal to 0.49%~~ when using distillate oil.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 120 million Btu per hour burner for the aggregate dryer shall be limited to 1.6 pounds per million Btu heat input ~~or a sulfur content of less than or equal to 1.42%~~ when using residual oil or waste oil.

...

D.1.7 Fuel Oil Usage [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3]

Pursuant to 326 IAC 2-8-4(1), the following limits shall apply:

...

- (c) the sulfur content of the waste fuel oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed ~~1.0~~ ~~0.5~~ percent.

...

- (f) For purposes of determining compliance, the following shall apply:

- (1) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 523.3 gallons of refinery blend fuel oil based on SO₂ emissions and a maximum No. 2 distillate fuel oil sulfur content of 0.5% such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. **However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;**
- (2) every 1,000 gallons of No. 2 distillate fuel oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to 510.6 gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. **However, the No. 2 fuel oil usage shall in no case exceed 2,505,000 gallons per twelve (12) consecutive month period;**
- (3) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to ~~980.0~~ ~~490.0~~ gallons of refinery blend fuel oil based on SO₂ emissions and a maximum waste oil sulfur content of ~~1.0~~ ~~0.5~~ % such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. **However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period;** and
- (4) every 1,000 gallons of waste oil burned in the 120 MMBtu per hour aggregate dryer burner shall be equivalent to ~~404.3~~ ~~406.9~~ gallons of refinery blend fuel oil based on NO_x emissions such that the total gallons of refinery blend fuel oil and refinery blend fuel oil equivalent input does not exceed the limit specified. **However, the waste oil usage shall in no case exceed 725,000 gallons per twelve (12) consecutive month period.**

D.1.8 Hydrogen Chloride (HCl) Emissions [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following shall apply:

- (a) the chlorine content of the waste oil used in the 120 MMBtu per hour burner for the aggregate dryer shall not exceed ~~four tenths eleven hundredths~~ of a percent (~~0.40~~ ~~0.11~~%) by weight.

- (b) the usage of waste oil in the 120 MMBtu per hour burner for the aggregate dryer shall be limited to ~~2,676,190~~ **725,000** U.S. gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.9 Carbon Monoxide (CO) Emissions [326 IAC 2-8-4]

The annual asphalt produced in the drum mixer/dryer shall be limited to ~~4,524,240~~ **1,475,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The CO emissions shall be limited to 0.13 pounds of CO per ton of asphalt produced.

...

D.1.10 Particulate Matter (PM) [326 IAC 2-2]

Particulate matter (PM) emissions from the drum mixer/dryer shall be limited to 0.237 pound PM per ton of asphalt mix produced. The annual asphalt produced in the drum mixer/dryer shall be limited to ~~4,524,240~~ **1,475,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits, combined with the potential PM emissions from all other emission units at this source will limit the source-wide potential to emit of PM to less than 250 tons per year, and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.11 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-3]

The annual asphalt produced in the drum mix dryer shall be limited to ~~4,524,240~~ **1,475,000** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Volatile organic compound (VOC) emissions from the drum mixer/dryer shall be limited to 0.032 pounds of VOC per ton of asphalt mix produced. Combined with the annual asphalt production limit and the VOC emissions from the other emission units at this source, source-wide emissions of VOC will be limited to less than one hundred (100) tons per year. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7 (Part 70 rules), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-3 (Emission Offset) (when located in a county that is nonattainment for ozone) not applicable.

...

D.1.15 Hydrogen Chloride Emissions and Chlorine Content

The Permittee shall demonstrate that the chlorine content of the fuel used does not exceed ~~eleven hundredths~~ **four tenths** of a percent (~~0.11%~~ **0.40**) by weight when operating on waste oil, by providing vendor analysis of fuel delivered accompanied by a vendor certification.

...

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Cold-mix (stockpile mix) asphalt storage piles; and

(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 Compound (VOC) [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), 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.~~

~~D.2.2 Cold Mix (Stockpile Mix) VOC Usage [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]~~

- ~~(a) — The usage of diluent in the production of cold mix (stockpile mix) asphalt shall be limited to 78.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months. This is equivalent to a VOC emission limit of 75.0 tons per twelve (12) consecutive month period in the production of cold mix (stockpile mix) asphalt.~~
- ~~(b) — The volume percent of diluent in the cutback asphalt shall not exceed 35%.~~
- ~~(c) — The VOC content of the diluent shall not exceed 95% by weight. Combined with the VOC emissions from the other emission units at this source, source-wide emissions of VOC will be limited to less than one hundred (100) tons per year. Compliance with this limit will satisfy 326 IAC 2-8-4 (FESOP), and will render 326 IAC 2-7 (Part 70 rules), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset) (when located in a county that is nonattainment for ozone) not applicable.~~

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

~~D.2.3 Record Keeping Requirements~~

~~To document compliance with Condition D.2.2, 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.2.2.~~

- ~~(a) — Diluent used in production of cold mix asphalt per month;~~
 - ~~(b) — Amount of diluent used last twelve (12) months;~~
 - ~~(c) — Type of liquid binder used; and~~
 - ~~(d) — Percent diluent (oil distillate) in liquid binder.~~
- ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

~~D.2.4 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.2 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).~~

...

2. Additionally, the permit has been updated to include Local Air Pollution Control Agency requirements when the Permittee relocates the portable plant to an area under the jurisdiction of any applicable Local Air Pollution Control Agency, as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) **and any local air pollution control agency having jurisdiction over the source.** The information describing the source contained in conditions A.1 and A.2 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.

...

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- ...
- (b) If IDEM, OAQ, and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit), 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.4 Local Air Pollution Control Agencies

- (a) If the Permittee seeks to relocate the portable plant to an area under the jurisdiction of any applicable Local Air Pollution Control Agency (LAPCA), the LAPCA may enact additional air pollution control requirements. The Permittee shall notify the applicable LAPCA when relocating to or from a LAPCA (See Condition C.21 for portable source relocation requirements).

- (b) The Local Air Pollution Control Agencies are:

Anderson
Jurisdiction: Madison County

City of Anderson, Air Management Division
P.O. Box 2100
120 East 8th Street
Anderson, IN 46018
Telephone Number: 765-648-6158
Facsimile Number: 765-648-5924

Evansville
Jurisdiction: City of Evansville plus four (4) miles beyond the corporate limits but not outside Vanderburgh County

Evansville EPA
D.K. Newsome Community Center
100 East Walnut Street, Suite 100
Evansville, IN 47713
Telephone Number: 812-435-6145
Facsimile Number: 812-435-6155

Gary
Jurisdiction: City of Gary

Gary Department of Environmental Affairs
839 Broadway, 2nd Floor NE
Gary, IN 46402
Telephone Number: 219-882-3000
Facsimile Number: 219-882-3012

Hammond
Jurisdiction: City of Hammond

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 46320
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

Indianapolis
Jurisdiction: Marion County

Office of Environmental Services
Administration Building
2700 South Belmont Avenue
Indianapolis, IN 46221
Telephone Number: 317-327-2237
Facsimile Number: 317-274-2274

Vigo County
Jurisdiction: Vigo County

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807
Telephone Number: 812-462-3433
Facsimile Number: 812-462-3447

B.5 4 Enforceability

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) **Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit).**

B.65 Severability

...

B.76 Property Rights or Exclusive Privilege

...

B.87 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, within a reasonable time, any information that IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, copies of

records required to be kept by this permit.

...

B.98 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, **or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)** 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.109 Certification

...

B.110 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 in letter form no later than April 15 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, on or before the date it is due.

B.124 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall **prepare and maintain and implement Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit**, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**. IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, 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).

...

B.132 Emergency Provisions [326 IAC 2-8-12]

...

B.143 Prior Permits Superseded [326 IAC 2-1.1-9.5]

...

B.154 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

...

B.165 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

...

B.176 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

...

B.187 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and any applicable Local Air Pollution Control Agency (as described in Condition

B.4 of this permit)

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, 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 2-6.1 until IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)** any additional information identified as being needed to process the application.

B.198 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

...

- (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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

...

B. 2019 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

...

B.2120 Source Modification Requirement

...

B.2224 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, U.S. EPA, or an authorized representative to perform the following:

...

B.2322 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

...

- (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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

...

B.243 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, 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.254 Credible Evidence [326 IAC 1-1-6]

...

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

- (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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

...

C.10 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, 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.

...

C.17 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, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, 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, **or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ, **or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, may extend the retesting deadline.
- (c) IDEM, OAQ, **or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

...

C.18 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner **or any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)** makes a request for

records to the Permittee, the Permittee shall furnish the records to the Commissioner **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, within a reasonable time.

...

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

...

- (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

and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, **and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit)**, on or before the date it is due.

...

- (f) **The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit). The general public may request this information from the IDEM, OAQ and any applicable Local Air Pollution Control Agency (as described in Condition B.4 of this permit) under 326 IAC 17.1.**

...

C.20 Relocation of Portable Sources [326 IAC 2-14-4]

- (a) **Pursuant to 2-14-4 (Relocation), a portable source, operation, process, or emissions unit that has been issued a valid operating permit under this article may be issued an approval letter for relocation that authorizes operation of the source, operation, process, or emissions unit as follows:**

- (1) **The source submits a notification at least thirty (30) days prior to relocation.**
- (2) **The commissioner shall approve or deny the relocation within thirty (30) days of receipt of the notification of the proposed relocation.**
- (3) **The application submitted for a permit revision in accordance with 326 IAC 2-6.1-6, 326 IAC 2-7-12, or 326 IAC 2-8-11.1 shall satisfy the notification requirements of this section.**

The commissioner shall not approve a relocation of a portable source, operation, process, or emissions unit, if the following applies:

- (1) **The relocation would allow a violation of the national ambient air quality standards (NAAQS).**

- (2) **The relocation would allow a violation of a prevention of significant deterioration (PSD) maximum allowable increase.**
- (3) **The source is not in compliance with all applicable air pollution control rules.**
- (4) **The relocation would adversely affect the public health.**

(b a) ~~This permit is approved for operation in all areas of Indiana except in Lake County, Porter County, and in areas that are designated as extreme, severe, or serious nonattainment for any National Ambient Air Quality Standard. This determination is based on the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 2-3 (Emission Offset), 326 IAC 2-6 (Emission Reporting), 326 IAC 5-1 (Opacity Limitations), and 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures). Prior to locating in areas that are designated as extreme, severe, or serious for any National Ambient Air Quality Standard, the Permittee must submit a request and obtain a permit modification.~~

This permit is approved for operation in all areas of Indiana except in extreme, severe, or serious nonattainment areas for ozone (at the time of this permit's issuance these areas were Lake and Porter Counties). This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2, and Emission Offset requirements in 326 IAC 2-3. Prior to locating in any severe nonattainment area, the Permittee must submit a request and obtain a permit modification.

(cb) A request to relocate shall be submitted to IDEM, OAQ at least thirty (30) days prior to the intended date of relocation. This submittal shall include the following:

- (1) A list of governmental officials entitled to receive notice of application to relocate. IC 13-15-3-1
- (2) A list of adjacent landowners that the Permittee will send written notice to not more than ten (10) days after submission of the request to relocate. IC 13-15-8

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

(de) A "Relocation Site Approval" letter shall be obtained prior to relocating.

(ed) The Permittee shall also notify the applicable local air pollution control agency (**LAPCA**) when relocating to, or from, one the following (**See Condition B.4 for LAPCA contact information**):

- (1) Madison County - (**City of Anderson, Office of Air Management Division**)
- ...
- (3) **City of Gary - (Gary Department of Environmental Affairs)**
- (4) **City of Hammond - (Hammond Department of Environmental Management)**
- (5) Marion County - (**City of Indianapolis, Office of Environmental Services**)
- (6) Vigo County - (Vigo County Air Pollution Control)

(fe) ~~For portable sources, a~~ valid operation permit consists of this document and any subsequent "Relocation Site Approval" letter specifying the current location of the portable plant.

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

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

...

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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

...

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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

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

...

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

FESOP Quarterly Report

Source Name: _____ Brooks Construction Company, Inc.
 Initial Source Address: _____ 5536 Hoagland Road, Poe, Indiana, 46745
 Mailing Address: _____ P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
 FESOP No.: _____ 003-19156-05190
 Facility: _____ Cold Mix (Stockpile Mix) Asphalt Storage piles
 Parameter: _____ Volatile Organic Compounds (VOC)
 Limit: _____ The VOC emissions from the production of cold mix (stockpile mix) asphalt shall be limited to 75.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months. This is equivalent to 78.9 tons of diluent used per twelve (12) consecutive month period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Diluent Usage This Month (tons)	Diluent Usage Previous 11 Months (tons)	12 Month Total Diluent Usage (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

and any Local Air Pollution Control Agency when applicable (see Condition B.4 of the permit)

FESOP Quarterly Report

Source Name: Brooks Construction Company, Inc.
Initial Source Address: 5536 Hoagland Road, Poe, Indiana, 46745
Mailing Address: P.O. Box 9560, 6525 Ardmore Ave., Fort Wayne, Indiana 46899
FESOP No.: 003-19156-05190
Facility: Aggregate Mixer/Dryer
Parameter: Hot Mix Asphalt Production
Limit: **1,475,000** ~~1,524,240~~ tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Production This Month (tons)	Production Previous 11 Months (tons)	12 Month Total Production (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.

Conclusion and Recommendation

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 17, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. F 003-26269-05190. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations Unlimited Potential Emissions Summary

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Asphalt Plant Maximum Capacity

Maximum Hourly Asphalt Production =	400	ton/hr			
Maximum Annual Asphalt Production =	3,504,000	ton/yr			
Maximum Fuel Input Rate =	120	MMBtu/hr			
Equivalent No. 2 Fuel Oil Usage =	7,508,571	gal/yr, and	0.50	% sulfur	
Refinery Blend (No. 2 and No. 6) Fuel Oil Limitation =	7,508,571	gal/yr, and	1.00	% sulfur	
Equivalent Used/Waste Oil Usage =	7,508,571	gal/yr, and	1.00	% sulfur	0.65 % ash 0.400 % chlorine, 0.040 % lead

Unlimited/Uncontrolled Emissions

Process Description	Unlimited/Uncontrolled Potential to Emit (tons/year)							
	Criteria Pollutants						Hazardous Air Pollutants	
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAP
Ducted Emissions								
Fuel Combustion (worst case)	156.18	124.45	563.14	176.45	3.75	18.77	108.95	99.11 (hydrogen chloride)
Dryer/Mixer	49,056.00	11,388.00	101.62	96.36	56.06	227.76	18.68	5.43 (formaldehyde)
Worst Case Emissions	49,056.00	11,388.00	563.14	176.45	56.06	227.76	108.95	99.11 (hydrogen chloride)
Fugitive Emissions								
Asphalt Load-Out and On-Site Yard	0.91	0.91	0	0	8.66	2.98	0.18	0.04 (formaldehyde)
Hot Oil System	0	0	0	0	5.8E-04	0.03	5.8E-04	3.7E-04 (naphthalene)
Material Storage Piles	1.92	0.67	0	0	0	0	0	0
Material Processing and Handling	11.32	5.35	0	0	0	0	0	0
Material Crushing, Screening, and Conveying	55.59	20.31	0	0	0	0	0	0
Unpaved Roads	78.96	20.12	0	0	0	0	0	0
Gasoline Dispensing	0	0	0	0	4.34	0	1.13	0.39 (xylenes)
Volatile Organic Liquid Storage Vessels	0	0	0	0	negl.	0	negl.	negl.
Total Fugitive Emissions	148.38	47.26	0	0	13.00	3.01	1.31	0.39 (xylenes)
Totals Unlimited/Uncontrolled PTE	49,204.38	11,435.26	563.14	176.45	69.06	230.77	110.26	99.11 (xylenes)

negl = negligible

Appendix A: Emissions Calculations
Unlimited Potential Emissions
Fuel Combustion with Maximum Capacity > 100 MMBtu/hr

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46896
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

The following calculations determine the Unlimited/Uncontrolled emissions created from the combustion of #2 fuel oil, refinery blend fuel oil, or waste oil in the dryer/mixer and all other fuel combustion sources at the source

Maximum Capacity

Maximum Annual Asphalt Production =	3,504,000	ton/yr					
Maximum Fuel Input Rate =	120	MMBtu/hr					
Equivalent No. 2 Fuel Oil Usage =	7,508,571	gal/yr, and	0.50	% sulfur			
Refinery Blend Fuel Oil Limitation =	7,508,571	gal/yr, and	1.00	% sulfur			
Equivalent Used/Waste Oil Usage =	7,508,571	gal/yr, and	1.00	% sulfur	0.65	% ash	0.400 % chlorine, 0.040 % lead

Unlimited/Uncontrolled Emissions

Criteria Pollutant	Emission Factor (units)			Unlimited/Uncontrolled Potential to Emit (tons/yr)			
	No. 2 Fuel Oil (lb/kgal)	Refinery Blend* (No. 2 and No. 6) Fuel Oil (lb/kgal)	Waste Oil (lb/kgal)	No. 2 Fuel Oil (tons/yr)	Refinery Blend* (No. 2 and No. 6) Fuel Oil (tons/yr)	Waste Oil (tons/yr)	Worse Case Fuel (tons/yr)
PM	2.0	7.0	41.6	7.51	26.28	156.18	156.18
PM10	3.3	8.3	33.15	12.39	31.16	124.45	124.45
SO2	78.5	150.0	147.0	294.71	563.14	551.88	563.14
NOx	24.0	47.0	19.0	90.10	176.45	71.33	176.45
VOC	0.20	0.20	1.0	0.75	0.75	3.75	3.75
CO	5.0	5.0	5.0	18.77	18.77	18.77	18.77
Hazardous Air Pollutant							
HCl			26.4			99.11	99.11
Antimony		5.25E-03	negl		0.020	negl	0.02
Arsenic	5.6E-04	1.32E-03	1.1E-01	2.10E-03	4.96E-03	0.413	0.41
Beryllium	4.2E-04	2.78E-05	negl	1.58E-03	1.04E-04	negl	1.6E-03
Cadmium	4.2E-04	3.98E-04	9.3E-03	1.58E-03	1.49E-03	0.035	0.03
Chromium	4.2E-04	8.45E-04	2.0E-02	1.58E-03	3.17E-03	0.075	0.08
Cobalt		6.02E-03	2.1E-04		0.023	7.88E-04	0.02
Lead	1.3E-03	1.51E-03	2.2	4.73E-03	5.67E-03	8.259	8.26
Manganese	8.4E-04	3.00E-03	6.8E-02	3.15E-03	0.011	0.255	0.26
Mercury	4.2E-04	1.13E-04		1.58E-03	4.24E-04		1.6E-03
Nickel	4.2E-04	8.45E-02	1.1E-02	1.58E-03	0.317	0.041	0.32
Selenium	2.1E-03	6.83E-04	negl	7.88E-03	2.56E-03	negl	7.9E-03
1,1,1-Trichloroethane		2.36E-04			8.86E-04		8.9E-04
1,3-Butadiene							0
Acetaldehyde							0
Acrolein							0
Benzene		2.14E-04			8.03E-04		8.0E-04
Bis(2-ethylhexyl)phthalate			2.2E-03			8.26E-03	8.3E-03
Dichlorobenzene			8.0E-07			3.00E-06	3.0E-06
Ethylbenzene		6.36E-05			2.39E-04		2.4E-04
Formaldehyde	6.10E-02	3.30E-02		0.229	0.124		0.23
Hexane							0
Phenol			2.4E-03			9.01E-03	9.0E-03
Toluene		6.20E-03			0.023		0.02
Total PAH Haps		1.13E-03	3.9E-02		4.24E-03	0.147	0.15
Polycyclic Organic Matter	3.30E-03			0.012			0.01
Xylene		1.09E-04			4.09E-04		4.1E-04
Total HAPs				0.27	0.54	108.36	108.95

Abbreviations

PM = Particulate Matter NOx = Nitrous Oxides HAP = Hazardous Air Pollutant
PM10 = Particulate Matter (<10 um) VOC = Volatile Organic Compounds HCl = Hydrogen Chloride
SO2 = Sulfur Dioxide CO = Carbon Monoxide PAH = Polyaromatic Hydrocarbon

Methodology

Natural Gas: Limited Potential to Emit (tons/yr) = (Natural Gas Limitation (MMCF/yr)) * (Emission Factor (lb/MMCF)) * (ton/2000 lbs)
All Other Fuels: Limited Potential to Emit (tons/yr) = (Fuel Limitation (gals/yr)) * (Emission Factor (lb/kgal)) * (kgal/1000 gal) * (ton/2000 lbs)
Sources of AP-42 Emission Factors for fuel combustion:

No. 2, No. 4, and No. 6 Fuel Oil: AP-42 Chapter 1.3 (dated 9/98), Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, 1.3-10, and 1.3-11
Waste Oil: AP-42 Chapter 1.11 (dated 10/96), Tables 1.11-1, 1.11-2, 1.11-3, 1.11-4, and 1.11-5

Note

* Since there are no specific AP-42 emission factors for combustion of refinery blend fuel oil, it was assumed that emissions from the combustion of refinery blend fuel oil (No. 2 and No. 6) were equal to the combustion of No. 4 fuel oil.

Appendix A: Emissions Calculations
Potential Fugitive Emissions
Material Storage Piles

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

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

$$E_f = 1.7 * (s/1.5) * (365-p) / 235 * (f/15)$$

where E_f = emission factor (lb/acre/day)
 s = silt content (wt %)
 p = 125 days of rain greater than or equal to 0.01 inches
 f = 15 % of wind greater than or equal to 12 mph

Material	Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)
Limestone	1.6	1.85	0.90	0.304	0.106
Sand	2.6	3.01	0.90	0.494	0.173
RAP	0.5	0.58	0.90	0.095	0.033
Gravel	1.6	1.85	0.90	0.304	0.106
Slag	3.8	4.40	0.90	0.722	0.253
Totals				1.92	0.67

Abbreviations

PM = Particulate Matter

PTE = Potential to Emit

PM10 = Particulate Matter (<10 um)

Methodology

PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)

PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%

*Silt content values obtained from AP-42 Table 13.2.4-1 (dated 1/95)

**Maximum pile size (acres) anticipated for a source with an annual asphalt production of 3,504,000 tons/yr

**Appendix A: Emissions Calculations
Unlimited Potential Fugitive Emissions
Material Processing and Handling**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^U \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: E_f = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
U =	10.2	= worst case annual mean wind speed (Source: NOAA, 2006*)
M =	4.0	= material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
E_f (PM) =	2.27E-03	lb PM/ton of material handled
E_f (PM10) =	1.07E-03	lb PM10/ton of material handled

Maximum Annual Asphalt Production =	3,504,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Material Handling Throughput =	3,328,800	tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	3.77	1.78
Front-end loader dumping of materials into feeder bins	3.77	1.78
Conveyor dropping material into dryer/mixer or batch tower	3.77	1.78
Total (tons/yr)	11.32	5.35

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
 Raw materials may include limestone, sand, recycled asphalt pavement (RAP), gravel, slag, and other additives
 *Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2006

Material Screening and Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from raw material crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	8.99	3.99
Screening	0.025	0.0087	41.61	14.48
Conveying	0.003	0.0011	4.99	1.83
Limited Potential to Emit (tons/yr) =			55.59	20.31

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]
 Raw materials may include stone/gravel, slag, and recycled asphalt pavement (RAP)
 Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

Notes

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by w (Table 11.19.2-2). The bulk moisture content of aggregate in the storage piles at a hot mix asphalt production plant typically stabilizes bet 3 to 5 percent by weight (Source: AP-42 Section 11.1.1.1).

Appendix A: Emissions Calculations Unlimited Potential Fugitive Emissions Unpaved Roads

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Maximum Annual Asphalt Production =	3,504,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Material Handling Throughput =	3,328,800	tons/yr
Maximum Asphalt Cement/Binder Throughput =	175,200	tons/yr
Maximum No. 2 Fuel Oil Usage =	7,508,571	gallons/yr

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	17.0	22.4	39.4	1.5E+05	5.9E+06	165	0.031	4644.0
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	17.0	0	17.0	1.5E+05	2.5E+06	165	0.031	4644.0
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	12.0	36.0	48.0	4.9E+03	2.3E+05	165	0.031	152.1
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	4.9E+03	5.8E+04	165	0.031	152.1
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.0	7.9E+02	3.5E+04	165	0.031	24.8
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	7.9E+02	9.5E+03	165	0.031	24.8
Aggregate/RAP Loader Full	Front-end loader (3 CY)	15.0	4.2	19.2	7.9E+05	1.5E+07	200	0.038	30021.6
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	15.0	0	15.0	7.9E+05	1.2E+07	200	0.038	30021.6
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	17.0	24.0	41.0	1.5E+05	6.0E+06	165	0.031	4562.5
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	17.0	0	17.0	1.5E+05	2.5E+06	165	0.031	4562.5
Total					2.2E+06	4.4E+07			7.9E+04

Average Vehicle Weight Per Trip =	20.3	tons/trip
Average Miles Per Trip =	0.036	miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	20.3	20.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	
Unmitigated Emission Factor, $E_f =$	6.09	1.55	lb/mile
Mitigated Emission Factor, $E_{ext} =$	4.01	1.02	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	14.15	3.61	9.31	2.37	4.65	1.19
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	14.15	3.61	9.31	2.37	4.65	1.19
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	0.463	0.118	0.305	0.078	0.152	0.039
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	0.463	0.118	0.305	0.078	0.152	0.039
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	0.076	0.019	0.050	0.013	0.025	0.006
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	0.076	0.019	0.050	0.013	0.025	0.006
Aggregate/RAP Loader Full	Front-end loader (3 CY)	91.49	23.32	60.16	15.33	30.08	7.67
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	91.49	23.32	60.16	15.33	30.08	7.67
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	13.90	3.54	9.14	2.33	4.57	1.17
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	13.90	3.54	9.14	2.33	4.57	1.17
Totals		240.17	61.21	157.92	40.25	78.96	20.12

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

Methodology

Maximum Material Handling Throughput = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Maximum Asphalt Cement/Binder Throughput = [Annual Asphalt Production Limitation (tons/yr)] * [Percent Asphalt Cement/Binder (weight %)]
 Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
 Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

**Appendix A: Emissions Calculations
Limited Emissions
Summary**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Asphalt Plant Limitations

Annual Asphalt Production Limitation =	1,475,000	ton/yr								
No. 2 Fuel Oil Limitation =	2,505,000	gal/yr, and	0.50	% sulfur						
Refinery Blend (No. 2 and No. 6) Fuel Oil Limitation =	1,311,333	gal/yr, and	1.00	% sulfur						
Used/Waste Oil Limitation =	725,000	gal/yr, and	1.00	% sulfur	0.65	% ash	0.400	% chlorine,	0.040	% lead
PM Dryer/Mixer Limitation =	0.237	lb/ton of asphlt production								
PM10 Dryer/Mixer Limitation =	0.107	lb/ton of asphlt production								
CO Dryer/Mixer Limitation =	0.130	lb/ton of asphlt production								
VOC Dryer/Mixer Limitation =	0.032	lb/ton of asphlt production								

Limited/Controlled Emissions

Process Description	Limited/Controlled Potential Emissions (tons/year)							
	Criteria Pollutants						Hazardous Air Pollutants	
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAP
Ducted Emissions								
Fuel Combustion (worst case)	15.08	12.02	98.35	30.82	0.36	6.26	10.61	9.57 (hydrogen chloride)
Dryer/Mixer	174.79	78.91	42.78	40.56	23.60	95.88	7.86	2.29 (formaldehyde)
Worst Case Emissions	174.79	78.91	98.35	40.56	23.60	95.88	10.61	9.57 (hydrogen chloride)
Fugitive Emissions								
Asphalt Load-Out and On-Site Yard	0.38	0.38	0	0	3.65	1.25	0.08	0.02 (formaldehyde)
Hot Oil System	0	0	0	0	5.8E-04	0.03	5.8E-04	3.7E-04 (naphthalene)
Material Storage Piles	1.92	0.67	0	0	0	0	0	0
Material Processing and Handling	4.77	2.25	0	0	0	0	0	0
Material Crushing, Screening, and Conveying	23.40	8.55	0	0	0	0	0	0
Unpaved Roads	33.23	8.47	0	0	0	0	0	0
Gasoline Dispensing	0	0	0	0	4.34	0	1.13	0.39 (xylenes)
Volatile Organic Liquid Storage Vessels	0	0	0	0	negl.	0	negl.	negl.
Total Fugitive Emissions	63.70	20.33	0	0	7.98	1.28	1.21	0.39 (xylenes)
Totals Limited/Controlled Emissions	238.49	99.24	98.35	40.56	31.58	97.16	11.82	9.57 (hydrogen chloride)

negl = negligible

Appendix A: Emissions Calculations
Limited Emissions
Dryer/Mixer Fuel Combustion with Maximum Capacity > 100 MMBtu/hr

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

The following calculations determine the limited emissions created from the combustion of #2 fuel oil, refinery blend fuel oil, or used/waste oil in the dryer/mixer and all other fuel combustion sources at the source.

Production and Fuel Limitations

Annual Asphalt Production Limitation =	1,475,000	ton/yr					
No. 2 Fuel Oil Limitation =	2,505,000	gal/yr, and	0.50	% sulfur			
Refinery Blend Fuel Oil Limitation =	1,311,333	gal/yr, and	1.00	% sulfur			
Used/Waste Oil Limitation =	725,000	gal/yr, and	1.00	% sulfur	0.65	% ash	0.400 % chlorine, 0.040 % lead

Limited Emissions

Criteria Pollutant	Emission Factor (units)			Limited Potential to Emit (tons/yr)			
	No. 2 Fuel Oil (lb/kgal)	Refinery Blend* (No. 2 and No. 6) Fuel Oil (lb/kgal)	Used/Waste Oil (lb/kgal)	No. 2 Fuel Oil (tons/yr)	Refinery Blend* (No. 2 and No. 6) Fuel Oil (tons/yr)	Used/Waste Oil (tons/yr)	Worse Case Fuel (tons/yr)
PM	2.0	7.0	41.6	2.51	4.59	15.08	15.08
PM10	3.3	8.3	33.15	4.13	5.44	12.02	12.02
SO2	78.5	150.0	147.0	98.32	98.35	53.29	98.35
NOx	24.0	47.0	19.0	30.06	30.82	6.89	30.82
VOC	0.20	0.20	1.0	0.25	0.13	0.36	0.36
CO	5.0	5.0	5.0	6.26	3.28	1.81	6.26
Hazardous Air Pollutant							
HCl			26.40			9.57	9.57
Antimony		5.25E-03	negl		3.44E-03	negl	3.4E-03
Arsenic	5.6E-04	1.32E-03	0.11	7.01E-04	8.65E-04	0.04	0.04
Beryllium	4.2E-04	2.78E-05	negl	5.26E-04	1.82E-05	negl	5.3E-04
Cadmium	4.2E-04	3.98E-04	9.3E-03	5.26E-04	2.61E-04	3.37E-03	3.4E-03
Chromium	4.2E-04	8.45E-04	0.02	5.26E-04	5.54E-04	7.25E-03	7.3E-03
Cobalt		6.02E-03	2.1E-04		3.95E-03	7.61E-05	3.9E-03
Lead	1.3E-03	1.51E-03	2.20	1.58E-03	9.90E-04	0.798	0.80
Manganese	8.4E-04	3.00E-03	0.07	1.05E-03	1.97E-03	0.025	0.02
Mercury	4.2E-04	1.13E-04		5.26E-04	7.41E-05		5.3E-04
Nickel	4.2E-04	0.08	0.01	5.26E-04	0.055	3.99E-03	0.06
Selenium	2.1E-03	6.83E-04	negl	2.63E-03	4.48E-04	negl	2.6E-03
1,1,1-Trichloroethane		2.36E-04			1.55E-04		1.5E-04
1,3-Butadiene							0
Acetaldehyde							0
Acrolein							0
Benzene		2.14E-04			1.40E-04		1.4E-04
Bis(2-ethylhexyl)phthalate			2.2E-03			7.98E-04	8.0E-04
Dichlorobenzene			8.0E-07			2.90E-07	2.9E-07
Ethylbenzene		6.36E-05			4.17E-05		4.2E-05
Formaldehyde	0.06	0.03		0.076	0.022		0.08
Hexane							0
Phenol			2.4E-03			8.70E-04	8.7E-04
Toluene		6.20E-03			4.07E-03		4.1E-03
Total PAH Haps		1.13E-03	0.04		7.41E-04	0.014	0.01
Polycyclic Organic Matter	3.30E-03			4.13E-03			4.1E-03
Xylene		1.09E-04			7.15E-05		7.1E-05
Total HAPs				0.09	0.09	10.46	10.61
Worst Single HAP				0.08	0.06	9.57	9.57

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC = Volatile Organic Compounds
CO = Carbon Monoxide
HAP = Hazardous Air Pollutant
HCl = Hydrogen Chloride
PAH = Polyaromatic Hydrocarbon

Methodology

Natural Gas: Limited Potential to Emit (tons/yr) = (Natural Gas Limitation (MMCF/yr)) * (Emission Factor (lb/MMCF)) * (ton/2000 lbs)
All Other Fuels: Limited Potential to Emit (tons/yr) = (Fuel Limitation (gals/yr)) * (Emission Factor (lb/kgal)) * (kgal/1000 gal) * (ton/2000 lbs)
Sources of AP-42 Emission Factors for fuel combustion:

No. 2, No.4, and No.6 Fuel Oil: AP-42 Chapter 1.3 (dated 9/98), Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, 1.3-10, and 1.3-11
Waste Oil: AP-42 Chapter 1.11 (dated 10/96), Tables 1.11-1, 1.11-2, 1.11-3, 1.11-4, and 1.11-5

Note

* Since there are no specific AP-42 emission factors for combustion of refinery blend fuel oil, it was assumed that emissions from the combustion of refinery blend fuel oil (No. 2 and No. 6) were equal to the combustion of No. 4 fuel oil.

Appendix A: Emissions Calculations
Limited Process Emissions
Dryer/Mixer
Volatile Organic Compounds and Hazardous Air Pollutants

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

The following calculations determine the limited emissions from the aggregate drying/mixing

Annual Asphalt Production Limitation =	1,475,000	ton/yr
PM Dryer/Mixer Limitation =	0.237	lb/ton of asphalt production
PM10 Dryer/Mixer Limitation =	0.107	lb/ton of asphalt production
CO Dryer/Mixer Limitation =	0.130	lb/ton of asphalt production
VOC Dryer/Mixer Limitation =	0.032	lb/ton of asphalt production

Criteria Pollutant	Emission Factor or Limitation (lb/ton)		Limited/Controlled Potential to Emit (tons/yr)		Worse Case PTE
	Drum-Mix Plant (dryer/mixer, controlled by fabric filter)		Drum-Mix Plant (dryer/mixer, controlled by fabric filter)		
	No. 2 Fuel Oil	Residual Oil or Waste Oil	No. 2 Fuel Oil	Residual Oil or Waste Oil	
PM	0.237	0.237	174.79	174.79	174.8
PM10	0.107	0.107	78.91	78.91	78.9
SO2	0.011	0.058	8.11	42.78	42.8
NOx	0.055	0.055	40.56	40.56	40.6
VOC	0.032	0.032	23.60	23.60	23.6
CO	0.13	0.13	95.9	95.9	95.9
Hazardous Air Pollutant					
HCl		2.10E-04		0.15	0.15
Antimony	1.80E-07	1.80E-07	1.33E-04	1.33E-04	1.33E-04
Arsenic	5.60E-07	5.60E-07	4.13E-04	4.13E-04	4.13E-04
Beryllium	negl	negl	negl	negl	0
Cadmium	4.10E-07	4.10E-07	3.02E-04	3.02E-04	3.02E-04
Chromium	5.50E-06	5.50E-06	4.06E-03	4.06E-03	4.06E-03
Cobalt	2.60E-08	2.60E-08	1.92E-05	1.92E-05	1.92E-05
Lead	1.50E-05	1.50E-05	0.01	0.01	0.01
Manganese	7.70E-06	7.70E-06	5.68E-03	5.68E-03	5.68E-03
Mercury	2.60E-06	2.60E-06	1.92E-03	1.92E-03	1.92E-03
Nickel	6.30E-05	6.30E-05	0.05	0.05	0.05
Selenium	3.50E-07	3.50E-07	2.58E-04	2.58E-04	2.58E-04
2,2,4 Trimethylpentane	4.00E-05	4.00E-05	0.03	0.03	0.03
Acetaldehyde		1.30E-03		0.96	0.96
Acrolein		2.60E-05		0.02	0.02
Benzene	3.90E-04	3.90E-04	0.29	0.29	0.29
Ethylbenzene	2.40E-04	2.40E-04	0.18	0.18	0.18
Formaldehyde	3.10E-03	3.10E-03	2.29	2.29	2.29
Hexane	9.20E-04	9.20E-04	0.68	0.68	0.68
Methyl chloroform	4.80E-05	4.80E-05	0.04	0.04	0.04
MEK		2.00E-05		0.01	0.01
Propionaldehyde		1.30E-04		0.10	0.10
Quinone		1.60E-04		0.12	0.12
Toluene	2.90E-03	2.90E-03	2.14	2.14	2.14
Total PAH Haps	8.80E-04	8.80E-04	0.65	0.65	0.65
Xylene	2.00E-04	2.00E-04	0.15	0.15	0.15

Total HAPs 7.86
Worst Single HAP 2.29 (formaldehyde)

Abbreviations

VOC - Volatile Organic Compounds
HCl = Hydrogen Chloride

SO2 = Sulfur Dioxide
HAP = Hazardous Air Pollutant

PAH = Polyaromatic Hydrocarbon

Methodology

Limited/Controlled Potential to Emit (tons/yr) = (Annual Asphalt Production Limitation (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
Emission Factors from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-3, 11.1-7, 11.1-8, 11.1-10, and 11.1-12

Note

* Since there are no specific AP-42 emission factors for refinery blend fuel oil, it was assumed that emissions from the refinery blend fuel oil (No. 2 and No. 6) were equal to the emissions from No. 6 fuel oil.

**Appendix A: Emissions Calculations
Fuel Equivalency Calculations
Fuel Combustion Units with Maximum Capacity > 100 MMBtu/hr**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

The following calculations determine the fuel equivalencies for each of the fuels as compared to refinery blend fuel oil (assumed similar to No. 4 fuel oil).

Fuel Type	SO2 Equivalency						NOx Equivalency			
	Limited Sulfur Content	Limited Sulfur Content Units	AP-42 Emission Factor	Emission Factor Units	Fuel Equivalency	Fuel Equivalency Units	AP-42 Emission Factor	Emission Factor Units	Fuel Equivalency	Fuel Equivalency Units
Refinery Blend (No. 2 and No. 6) Fuel Oil	1.00	% by weight	150.00	lb/kgal	1.00	gal refinery blend fuel oil / gal refinery blend fuel oil	47.00	lb/kgal	1.00	gal refinery blend fuel oil / gal refinery blend fuel oil
No. 2 Fuel Oil	0.50	% by weight	78.50	lb/kgal	523.3	gal refinery blend fuel oil/1000 gal No. 2 fuel oil	24.00	lb/kgal	510.6	gal refinery blend fuel oil/1000 gal No. 2 fuel oil
Waste Oil	1.00	% by weight	147.00	lb/kgal	980.0	gal refinery blend fuel oil/1000 gal waste oil	19.00	lb/kgal	404.3	gal refinery blend fuel oil/1000 gal waste oil

Methodology

Fuel Equivalency = ([AP-42 Emission Factor for residual fuel oil (lb/kgal)] / [AP-42 Emission Factor for any fuel type (lb/kgal)]) * 1000

Sources of AP-42 Emission Factors for fuel combustion:

No. 2, No.4, and residual fuel oil (industrial boiler > 100 MMBtu/hr): AP-42 Chapter 1.3 (dated 9/98), Table 1.3-1

Waste Oil (small boiler): AP-42 Chapter 1.11 (dated 10/96), Table 1.11-2

Note

* Since there are no specific AP-42 emission factors for combustion of refinery blend fuel oil, it was assumed that emissions from the combustion of refinery blend fuel oil were equal to the combustion of residual or No. 4 fuel oil.

**Appendix A: Emissions Calculations
Limited Fugitive Emissions
Load-Out and On-Site Yard Emissions**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

The following calculations determine the limited fugitive emissions from hot asphalt mix load-out and on-site yard plant for a drum mix hot mix asphalt plant

Asphalt Temperature, T =	325	F
Asphalt Volatility Factor, V =	-0.5	
Annual Asphalt Production Limitation =	1,475,000	tons/yr

Pollutant	Emission Factor (lb/ton asphalt)		Limited Potential to Emit (tons/yr)		
	Load-Out	On-Site Yard	Load-Out	On-Site Yard	Total
Total PM	5.2E-04	NA	0.38	NA	0.38
Organic PM	3.4E-04	NA	0.25	NA	0.25
TOC	0.004	0.001	3.07	0.811	3.9
CO	0.001	3.5E-04	1.00	0.260	1.25

NA = Not Applicable (no AP-42 Emission Factor)

PM/HAPs	0.018	0	0.018
VOC/HAPs	0.045	0.012	0.057
non-VOC/HAPs	2.4E-04	6.2E-05	3.0E-04
non-VOC/non-HAPs	0.22	0.06	0.28

Total VOCs	2.88	0.8	3.6
Total HAPs	0.06	0.012	0.08
Worst Single HAP			0.016 (formaldehyde)

Abbreviations

TOC = Total Organic Compounds
CO = Carbon Monoxide

PM = Particulate Matter
HAP = Hazardous Air Pollutant

VOC = Volatile Organic Compound

Methodology

Limited Potential to Emit (tons/yr) = (Annual Asphalt Production Limitation (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Emission Factors from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-14, 11.1-15, and 11.1-16

Plant Load-Out Emission Factor Equations (AP-42 Table 11.1-14)::

$$\text{Total PM/PM}_{10} \text{ Ef} = 0.000181 + 0.00141(-V)e^{((0.0251)(T+460)-20.43)}$$

$$\text{Organic PM Ef} = 0.00141(-V)e^{((0.0251)(T+460)-20.43)}$$

$$\text{TOC Ef} = 0.0172(-V)e^{((0.0251)(T+460)-20.43)}$$

$$\text{CO Ef} = 0.00558(-V)e^{((0.0251)(T+460)-20.43)}$$

On Site Yard CO emissions estimated by multiplying the TOC emissions by 0.32

**Appendix A: Emissions Calculations
Limited Fugitive Emissions
Load-Out and On-Site Yard Emissions (continued)**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Organic Particulate-Based Compounds (Table 11.1-15)

Pollutant	CASRN	Category	HAP Type	Source	Speciation Profile	Limited Potential to Emit (tons/yr)		
					Load-out and Onsite Yard (% by weight of Total Organic PM)	Load-out	Onsite Yard	Total
PAH HAPs								
Acenaphthene	83-32-9	PM/HAP	POM	Organic PM	0.26%	6.5E-04	NA	6.5E-04
Acenaphthylene	208-96-8	PM/HAP	POM	Organic PM	0.028%	7.0E-05	NA	7.0E-05
Anthracene	120-12-7	PM/HAP	POM	Organic PM	0.07%	1.8E-04	NA	1.8E-04
Benzo(a)anthracene	56-55-3	PM/HAP	POM	Organic PM	0.019%	4.8E-05	NA	4.8E-05
Benzo(b)fluoranthene	205-99-2	PM/HAP	POM	Organic PM	0.0076%	1.9E-05	NA	1.9E-05
Benzo(k)fluoranthene	207-08-9	PM/HAP	POM	Organic PM	0.0022%	5.5E-06	NA	5.5E-06
Benzo(g,h,i)perylene	191-24-2	PM/HAP	POM	Organic PM	0.0019%	4.8E-06	NA	4.8E-06
Benzo(a)pyrene	50-32-8	PM/HAP	POM	Organic PM	0.0023%	5.8E-06	NA	5.8E-06
Benzo(e)pyrene	192-97-2	PM/HAP	POM	Organic PM	0.0078%	2.0E-05	NA	2.0E-05
Chrysene	218-01-9	PM/HAP	POM	Organic PM	0.103%	2.6E-04	NA	2.6E-04
Dibenz(a,h)anthracene	53-70-3	PM/HAP	POM	Organic PM	0.00037%	9.3E-07	NA	9.3E-07
Fluoranthene	206-44-0	PM/HAP	POM	Organic PM	0.05%	1.3E-04	NA	1.3E-04
Fluorene	86-73-7	PM/HAP	POM	Organic PM	0.77%	1.9E-03	NA	1.9E-03
Indeno(1,2,3-cd)pyrene	193-39-5	PM/HAP	POM	Organic PM	0.00047%	1.2E-06	NA	1.2E-06
2-Methylnaphthalene	91-57-6	PM/HAP	POM	Organic PM	2.38%	6.0E-03	NA	0.006
Naphthalene	91-20-3	PM/HAP	POM	Organic PM	1.25%	3.1E-03	NA	3.1E-03
Perylene	198-55-0	PM/HAP	POM	Organic PM	0.022%	5.5E-05	NA	5.5E-05
Phenanthrene	85-01-8	PM/HAP	POM	Organic PM	0.81%	2.0E-03	NA	2.0E-03
Pyrene	129-00-0	PM/HAP	POM	Organic PM	0.15%	3.8E-04	NA	3.8E-04
Total PAH HAPs						0.015	NA	0.015
Other semi-volatile HAPs								
Phenol		PM/HAP	---	Organic PM	1.18%	3.0E-03	0	3.0E-03

NA = Not Applicable (no AP-42 Emission Factor)

Abbreviations

PM = Particulate Matter

HAP = Hazardous Air Pollutant

POM = Polycyclic Organic Matter

Methodology

Limited Potential to Emit (tons/yr) = [Speciation Profile (%)] * [Organic PM (tons/yr)]

Speciation Profiles from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-15 and 11.1-16

Appendix A: Emissions Calculations
Limited Fugitive Emissions
Load-Out and On-Site Yard Emissions (continued)

Organic Volatile-Based Compounds (Table 11.1-16)

Pollutant	CASRN	Category	HAP Type	Source	Speciation Profile	Limited Potential to Emit (tons/yr)		
					Load-out and Onsite Yard (% by weight of TOC)	Load-out	Onsite Yard	Total
VOC		VOC	---	TOC	94%	2.88	0.76	3.65
non-VOC/non-HAPS								
Methane	74-82-8	non-VOC/non-HAP	---	TOC	6.50%	2.0E-01	5.3E-02	0.252
Acetone	67-64-1	non-VOC/non-HAP	---	TOC	0.046%	1.4E-03	3.7E-04	0.002
Ethylene	74-85-1	non-VOC/non-HAP	---	TOC	0.71%	2.2E-02	5.8E-03	0.028
Total non-VOC/non-HAPS					7.30%	0.224	0.059	0.28
Volatile organic HAPs								
Benzene	71-43-2	VOC/HAP	---	TOC	0.052%	1.6E-03	4.2E-04	2.0E-03
Bromomethane	74-83-9	VOC/HAP	---	TOC	0.0096%	2.9E-04	7.8E-05	3.7E-04
2-Butanone	78-93-3	VOC/HAP	---	TOC	0.049%	1.5E-03	4.0E-04	1.9E-03
Carbon Disulfide	75-15-0	VOC/HAP	---	TOC	0.013%	4.0E-04	1.1E-04	5.0E-04
Chloroethane	75-00-3	VOC/HAP	---	TOC	0.00021%	6.4E-06	1.7E-06	8.1E-06
Chloromethane	74-87-3	VOC/HAP	---	TOC	0.015%	4.6E-04	1.2E-04	5.8E-04
Cumene	92-82-8	VOC/HAP	---	TOC	0.11%	3.4E-03	8.9E-04	4.3E-03
Ethylbenzene	100-41-4	VOC/HAP	---	TOC	0.28%	8.6E-03	2.3E-03	0.011
Formaldehyde	50-00-0	VOC/HAP	---	TOC	0.088%	2.7E-03	7.1E-04	0.003
n-Hexane	100-54-3	VOC/HAP	---	TOC	0.15%	4.6E-03	1.2E-03	0.006
Isooctane	540-84-1	VOC/HAP	---	TOC	0.0018%	5.5E-05	1.5E-05	7.0E-05
Methylene Chloride	75-09-2	non-VOC/HAP	---	TOC	0	0	0	0.0E+00
MTBE	1634-04-4	VOC/HAP	---	TOC	0	0	0	0
Styrene	100-42-5	VOC/HAP	---	TOC	0.0073%	2.2E-04	5.9E-05	2.8E-04
Tetrachloroethene	127-18-4	non-VOC/HAP	---	TOC	0.0077%	2.4E-04	6.2E-05	3.0E-04
Toluene	100-88-3	VOC/HAP	---	TOC	0.21%	6.4E-03	1.7E-03	0.008
1,1,1-Trichloroethane	71-55-6	VOC/HAP	---	TOC	0	0	0	0
Trichloroethene	79-01-6	VOC/HAP	---	TOC	0	0	0	0
Trichlorofluoromethane	75-69-4	VOC/HAP	---	TOC	0.0013%	4.0E-05	1.1E-05	5.0E-05
m-/p-Xylene	1330-20-7	VOC/HAP	---	TOC	0.41%	1.3E-02	3.3E-03	0.016
o-Xylene	95-47-6	VOC/HAP	---	TOC	0.08%	2.5E-03	6.5E-04	3.1E-03
Total volatile organic HAPs					1.50%	0.046	0.012	0.058

Abbreviations

TOC = Total Organic Compounds

HAP = Hazardous Air Pollutant

VOC = Volatile Organic Compound

MTBE = Methyl tert butyl ether

Methodology

Limited Potential to Emit (tons/yr) = [Speciation Profile (%)] * [TOC (tons/yr)]

Speciation Profiles from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-15 and 11.1-16

**Appendix A: Emissions Calculations
Limited Fugitive Emissions
Material Processing and Handling**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^{1.3} \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: E_f = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
U =	10.2	= worst case annual mean wind speed (Source: NOAA, 2005*)
M =	4.0	= material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
E_f (PM) =	2.27E-03	lb PM/ton of material handled
E_f (PM10) =	1.07E-03	lb PM10/ton of material handled

Annual Asphalt Production Limitation =	1,475,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Material Handling Throughput =	1,401,250	tons/yr

Type of Activity	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)
Truck unloading of materials into storage piles	1.59	0.75
Front-end loader dumping of materials into feeder bins	1.59	0.75
Conveyor dropping material into dryer/mixer or batch tower	1.59	0.75
Total (tons/yr)	4.77	2.25

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Limited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
 Raw materials may include limestone, sand, recycled asphalt pavement (RAP), gravel, slag, and other additives
 *Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2005

Material Screening and Conveying (AP-42 Section 19.2.2)

To estimate potential fugitive dust emissions from raw material crushing, screening, and conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 19.2.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)
Crushing	0.0054	0.0024	3.78	1.68
Screening	0.025	0.0087	17.52	6.10
Conveying	0.003	0.0011	2.10	0.77
Limited Potential to Emit (tons/yr) =			23.40	8.55

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Limited Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]
 Raw materials may include stone/gravel, slag, and recycled asphalt pavement (RAP)
 Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2
 *Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (Table 11.19.2-2). The bulk moisture content of aggregate in the storage piles at a hot mix asphalt production plant typically stabilizes between 3 to 5 percent by weight (Source: AP-42 Section 11.1.1.1).

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PTE = Potential to Emit

**Appendix A: Emissions Calculations
Limited Fugitive Emissions
Unpaved Roads**

Company Name: Brooks Construction Company, Inc.
Source Address: 10,000 Diebold Road, Ft. Wayne, IN 46899
Permit Number: 003-19156-05190
Revision No.: 003-26269-05190
Reviewer: Hannah L. Desrosiers
Submitted: March 17, 2008

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Annual Asphalt Production Limitation =	1,475,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Material Handling Throughput =	1,401,250	tons/yr
Maximum Asphalt Cement/Binder Throughput =	73,750	tons/yr
No. 2 Fuel Oil Limitation =	2,505,000	gallons/yr

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	17.0	22.4	39.4	6.3E+04	2.5E+06	165	0.031	1954.9
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	17.0	0	17.0	6.3E+04	1.1E+06	165	0.031	1954.9
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	12.0	36.0	48.0	2.0E+03	9.8E+04	165	0.031	64.0
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	2.0E+03	2.5E+04	165	0.031	64.0
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.0	2.6E+02	1.2E+04	165	0.031	8.3
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	2.6E+02	3.2E+03	165	0.031	8.3
Aggregate/RAP Loader Full	Front-end loader (3 CY)	15.0	4.2	19.2	3.3E+05	6.4E+06	200	0.038	12637.5
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	15.0	0	15.0	3.3E+05	5.0E+06	200	0.038	12637.5
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	17.0	24.0	41.0	6.1E+04	2.5E+06	165	0.031	1920.6
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	17.0	0	17.0	6.1E+04	1.0E+06	165	0.031	1920.6
Total					9.2E+05	1.9E+07			3.3E+04

Average Vehicle Weight Per Trip =	20.3	tons/trip
Average Miles Per Trip =	0.036	miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

where k =	PM	PM10	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.9	1.5	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	4.8	4.8	= constant (AP-42 Table 13.2.2-2)
W =	0.7	0.9	tons = average vehicle weight (provided by source)
b =	20.3	20.3	= constant (AP-42 Table 13.2.2-2)
	0.45	0.45	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$	PM	PM10
where P =	125	125
	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)	

Unmitigated Emission Factor, $E_f =$	6.09	1.55	lb/mile
Mitigated Emission Factor, $E_{ext} =$	4.01	1.02	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	5.96	1.52	3.92	1.00	1.96	0.50
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	5.96	1.52	3.92	1.00	1.96	0.50
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	0.195	0.050	0.128	0.033	0.064	0.016
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	0.195	0.050	0.128	0.033	0.064	0.016
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	0.025	0.006	0.017	0.004	0.008	0.002
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	0.025	0.006	0.017	0.004	0.008	0.002
Aggregate/RAP Loader Full	Front-end loader (3 CY)	38.51	9.82	25.32	6.45	12.66	3.23
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	38.51	9.82	25.32	6.45	12.66	3.23
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	5.85	1.49	3.85	0.98	1.92	0.49
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	5.85	1.49	3.85	0.98	1.92	0.49
Totals		101.08	25.76	66.47	16.94	33.23	8.47

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PTE = Potential to Emit

Methodology

Maximum Material Handling Throughput = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
 Maximum Asphalt Cement/Binder Throughput = [Annual Asphalt Production Limitation (tons/yr)] * [Percent Asphalt Cement/Binder (weight %)]
 Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
 Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)