



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: June 22, 2010

RE: Paul H. Rohe Company, Inc. - River Terminal / 029-28960-00031

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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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Paul H. Rohe Company, Inc. – River Terminal
11048 Highway 56
Aurora, Indiana 47001**

(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.

This permit is issued to the above-mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

| | |
|--|--|
| Operation Permit No.: M029-28960-00031 | |
| Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: June 22, 2010 Expiration Date: June 22, 2020 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary River Terminal, consisting of a barge unloading and truck loading operation for sand, gravel, limestone, crushed limestone, agricultural limestone, coal, and other similar materials. This source does not perform any crushing activities.

| | |
|------------------------------|---|
| Source Address: | 11048 Highway 56, Aurora, Indiana 47001 |
| General Source Phone Number: | (513) 771-0820 |
| SIC Code: | 4491, 5032 |
| County Location: | Dearborn |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) barge unloading and truck loading operation, unloading a maximum of one hundred fifty (150) tons of sand, gravel, crushed limestone, coal, coke, fertilizer, salt, grain, slag, potash, and crushed glass per hour, consisting of the following equipment:
- (1) one (1) crane for unloading barges;
 - (2) six (6) conveyors, with a continuous wetting system for fugitive particulate matter control;
 - (3) one (1) sand, one (1) gravel, five (5) crushed limestone, two (2) limestone, and one (1) agriculture lime storage piles, each with a maximum storage capacity of 10,000 tons;
 - (4) one (1) coal storage pile and one (1) storage pile for other material, each with a maximum storage capacity of 5,000 tons;
 - (5) one (1) front end loader for loading trucks; and
 - (6) one (1) fifty (50) ton storage bin.
- (b) One (1) lane unpaved crushed limestone roadway to the storage piles, with watering for fugitive particulate matter control.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

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

- (a) This permit, M029-28960-00031, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M029-28960-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 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 shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (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.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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]

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

C.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 attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.13 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) barge unloading and truck loading operation, unloading a maximum of one hundred fifty (150) tons of sand, gravel, crushed limestone, coal, coke, fertilizer, salt, grain, slag, potash, and crushed glass per hour, consisting of the following equipment:
- (1) one (1) crane for unloading barges;
 - (2) six (6) conveyors, with a continuous wetting system for fugitive particulate matter control;
 - (3) one (1) sand, one (1) gravel, five (5) crushed limestone, two (2) limestone, and one (1) agriculture lime storage piles, each with a maximum storage capacity of 10,000 tons;
 - (4) one (1) coal storage pile and one (1) storage pile for other material, each with a maximum storage capacity of 5,000 tons;
 - (5) one (1) front end loader for loading trucks; and
 - (6) one (1) fifty (50) ton storage bin.
- (b) One (1) lane unpaved crushed limestone roadway to the storage piles, with watering for fugitive particulate matter control.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the conveyors, storage piles, aggregate handling operation and truck loading operation shall not exceed 55.40 pounds per hour when operating at a process weight rate of 300,000 pounds per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.1.2 Fugitive Particulate Matter [326 IAC 6-5]

A Fugitive Dust Plan is required for these facilities. Section C – Fugitive Particulate Matter Emission Limitations contains the Permittee's obligation with regard to the fugitive dust plan required by this condition.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the continuous wetting system for particulate control shall be in operation and control emissions from the material loading and/or unloading operations at all times while loading and/or unloading sand, gravel, crushed limestone, coal, coke, slag, and crushed glass.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the storage piles, unpaved roadways, and the material loading and unloading operations shall be performed 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 a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the storage piles, unpaved roadways, and the material loading and unloading operations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|----------------------|---|
| Company Name: | Paul H. Rohe Company, Inc. – River Terminal |
| Address: | 11048 Highway 56 |
| City: | Aurora, Indiana 47001 |
| Phone #: | (513) 771-0820 |
| MSOP #: | M029-28960-00031 |

I hereby certify that Paul H. Rohe Company, Inc.
– River Terminal is :

- still in operation.
- no longer in operation.

I hereby certify that Paul H. Rohe Company, Inc.
– River Terminal is :

- in compliance with the requirements MSOP M029-28960-00031.
- not in compliance with the requirements of MSOP M029-28960-00031.

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Date: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR A COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**MINOR SOURCE OPERATING PERMIT
(MSOP) RENEWAL
OFFICE OF AIR QUALITY**

**Paul H. Rohe Company, Inc. – River Terminal
11048 Highway 56,
Aurora, Indiana 47001**

Attachment A

**RIVER TERMINAL -
BULK MATERIAL STORAGE &
TRANSFER STATION
FUGITIVE DUST CONTROL PLAN**

M029-28960-00031

RIVER TERMINAL SITE FUGITIVE DUST CONTROL PLAN

- (a) Fugitive particulate matter emissions resulting from the emission points specified in this section shall be controlled, as follows:
- (1) Fugitive particulate matter emissions from unpaved roads and parking lots shall be controlled by one or more of the following methods:
 - (A) watering;
 - (2) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:
 - (A) maintaining minimum size and number of stock piles of aggregate and other materials;
 - (B) treating around the stockpile area with water;
 - (C) treating the stockpiles with water.
 - (3) Fugitive particulate matter emissions from outdoor conveying of aggregates and other materials shall be controlled by the following method on an as needed basis:
 - (A) applying water at the feed, intermediate, drop, and transfer points.
 - (4) Fugitive particulate matter emissions from the transfer of aggregates and other materials shall be controlled by one or more of the following methods:
 - (A) minimize the vehicular distance between transfer points;
 - (B) apply water on transfer points on an as needed basis.
 - (5) Fugitive particulate matter emissions from transportation of aggregate and other materials by truck, front-end loader, etc. shall be controlled by one or more of the following methods:
 - (A) tarping the hauling vehicles;
 - (B) maintain vehicle bodies in a condition to prevent leakage;
 - (C) spray the aggregates with water;
 - (D) maintain a 10 MPH speed limit in the yard.
 - (6) Fugitive particulate matter emissions from the loading and unloading of aggregate and other materials shall be controlled by one or more of the following methods:
 - (A) reduce free fall distance to a minimum;
 - (B) reduce the rate of discharge of the aggregate and other materials;
 - (C) spray the aggregate with water on an as needed basis.
- (b) The above listed measures shall be carried out such that the following visible emission conditions are met:
- (1) Visible emissions from storage piles shall not exceed twenty percent (20%) in twenty four (24) consecutive readings in a six (6) minute period. This limitation may not apply during periods when application of control measures are ineffective or unreasonable due to sustained very high wind speeds.

- (2) Visible emissions from unpaved roadways shall not exceed an average instantaneous opacity of twenty percent (20%).
- (3) Visible emissions from the material loading and unloading operations shall not exceed an average instantaneous opacity of twenty percent (20%).

Compliance with these opacity limitations shall also satisfy the requirements of 326 IAC 5-1.

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

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

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Background and Description

| | |
|----------------------------|--|
| Source Name: | Paul H. Rohe Company, Inc. – River Terminal |
| Source Location: | 11048 Highway 56, Aurora, Indiana 47001 |
| County: | Dearborn |
| SIC Code: | 4491, 5032 |
| Permit Renewal No.: | 029-28960-00031 |
| Permit Reviewer: | Hannah L. Desrosiers |

On May 18, 2010, the Office of Air Quality (OAQ) had a notice published in Journal Press, Lawrenceburg, Indiana, stating that Paul H. Rohe Company, Inc. had applied for a renewal of their MSOP, issued on June 16, 2005, to continue operation of their existing river terminal, including; barge unloading and truck loading operation for sand, gravel, limestone, crushed limestone, agricultural limestone, coal, and other similar materials, source. The notice also stated that the OAQ proposed to issue a MSOP Renewal 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

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

Mailing Address: ~~11641 Mosteller Road, Cincinnati, OH 45241~~

- (b) The "FESOP" Renewal on the cover page for the fugitive dust control plan has been corrected to reflect the MSOP Status of this source.

**MINOR SOURCE OPERATING PERMIT
(MSOP) RENEWAL
~~FEDERALLY ENFORCEABLE~~
~~STATE OPERATING PERMIT RENEWAL~~
OFFICE OF AIR QUALITY**

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. 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

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

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Description and Location

| | |
|----------------------------|--|
| Source Name: | Paul H. Rohe Company, Inc. – River Terminal |
| Source Location: | 11048 Highway 56, Aurora, Indiana 47001 |
| County: | Dearborn |
| SIC Code: | 4491, 5032 |
| Permit Renewal No.: | 029-28960-00031 |
| Permit Reviewer: | Hannah L. Desrosiers |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Paul H. Rohe Company, Inc. relating to the operation of a river terminal, including; barge unloading and truck loading operation for sand, gravel, limestone, crushed limestone, agricultural limestone, coal, and other similar materials.

Source Definition

This company consists of the following plants:

- (a) The Paul H. Rohe Company, Inc. – River Terminal is located at 11048 Highway 56, Aurora, Indiana, Plant ID: 029-00031; and
- (b) The Paul H. Rohe Company, Inc. - Asphalt Plant is located at 3919 East Laughery Creek Road, Aurora, Indiana, Plant ID: 029-00039.

IDEM, OAQ examined whether the two sources are one “major source” as defined at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;

The two plants are both owned by Paul H. Rohe Company, Inc., meeting the first element of the definition.

- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

The plants do not have the same two-digit SIC Code. The asphalt plant has the SIC Code 29 for the major group Petroleum Refining and Related Industries, which includes asphalt paving mixtures under the four digit code 2951. The River Terminal plant has the SIC Code 44 for the major group Water Transportation, which includes marine cargo handling under the four digit code 4491. Neither plant provides any support, output, or does any work for the other plant. All of the asphalt plant’s aggregate is received by truck from other sources. None of the asphalt plant’s output is sent out using the River Terminal. Since the plants do not have the same two-digit SIC Code and neither one is a support facility for the other, the second element of the definition is not met.

- (3) the plants must be located on contiguous or adjacent properties.

The plants are not located on contiguous properties. The Paul H. Rohe Company, Inc.’s River Terminal, ID 029-00031, is located approximately three tenths of a mile (0.3 mile) from the Paul H. Rohe Company, Inc.’s Asphalt Plant, ID 029-00039. Additionally, the plants will operate

independently of each other. None of the products, by products or work from either plant will go to the other plant. There is no interaction of either plant on the other. The distance between the plants does not enable them to operate as one source. The two plants are not located on adjacent properties.

Since all of the elements of the major source definition have not been met, IDEM, OAQ has determined that the two plants do not meet the definition of a major source. Therefore, based on this evaluation these plants will not be considered one (1) source, as defined by 326 IAC 2-7-1(22). This is the first determination to be made for this source.

Existing Approvals

The source has been operating under MSOP Renewal No. 029-20575-00031, issued on June 16, 2005.

County Attainment Status

The source is located in Center Township, Dearborn County. The following attainment status designations are applicable to Dearborn County:

| Pollutant | Designation |
|-----------|---|
| O3 | Nonattainment Subpart 1 effective June 15, 2004, for the 8-hour ozone standard for the Cincinnati-Hamilton OH-KY-IN area, including Lawrenceburg Township of Dearborn County. The remainder of Dearborn County is unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹ |
| PM10 | Unclassifiable effective November 15, 1990. |
| PM2.5 | Basic nonattainment designation effective federally April 5, 2005, for the Lawrenceburg Twp for PM2.5. The remainder of Dearborn County is unclassifiable or attainment effective April 5, 2005, for PM2.5. |
| SO2 | Cannot be classified. |
| NO2 | Cannot be classified or better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| Pb | Not designated. |

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard, which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
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. Center Township, Dearborn 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**
Center Township, Dearborn County, has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Center Township, Dearborn County, has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since 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, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Permitted Emission Units and Pollution Control Equipment

On February 9, 2010, the Paul H. Rohe Company, Inc. – River Terminal, submitted an application to the OAQ requesting to renew its operating permit. The Paul H. Rohe Company, Inc. – River Terminal, was issued a MSOP Renewal on June 16, 2005.

The source consists of the following permitted emission unit(s):

- (a) One (1) barge unloading and truck loading operation, unloading a maximum of one hundred fifty (150) tons of sand, gravel, crushed limestone, coal, coke, fertilizer, salt, grain, slag, potash, and crushed glass per hour, consisting of the following equipment:
 - (1) one (1) crane for unloading barges;
 - (2) six (6) conveyors, with a continuous wetting system for fugitive particulate matter control;
 - (3) one (1) sand, one (1) gravel, five (5) crushed limestone, two (2) limestone, and one (1) agriculture lime storage piles, each having a maximum height of twenty-five (25) feet and a maximum storage capacity of 10,000 tons;
 - (4) one (1) coal storage pile and one (1) storage pile for other material, each having a maximum height of twenty-five (25) feet and a maximum storage capacity of 5,000 tons;
 - (5) one (1) front end loader for loading trucks; and
 - (6) one (1) fifty (50) ton storage bin.
- (b) One (1) lane unpaved crushed limestone roadway to the storage piles, with watering for fugitive particulate matter control.

Note: This source does not perform any crushing activities.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

There have been no emission units or pollution control equipment removed from the source during this review process.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|---------------------|-------------------------------|
| PM ⁽¹⁾ | 320.79 |
| PM10 ⁽²⁾ | 93.64 |
| PM2.5 | 7.89 |
| SO ₂ | 0 |
| NO _x | 0 |
| VOC | 0 |
| CO | 0 |
| HAPs | 0 |

- (1) The potential to emit particulate matter (PM) without the inclusion of fugitive emissions is one and ninety-seven hundredths (1.97) tons per year. See the "PTE of the Entire Source after Issuance of the MSOP" for further explanation.
 - (2) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM, including fugitive and non-fugitive emissions, is greater than two hundred fifty (250) tons per year. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(gg)(1) (PSD), and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of Prevention of Significant Deterioration (PSD) (326 IAC 2-2) applicability. Therefore, pursuant to 326 IAC 2-2, the PSD requirements still do not apply and the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) Renewal will be issued.
 - (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM10 is still less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are still less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) Renewal will be issued.
 - (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is still an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of MSOP (tons/year) | | | | | | | | |
|---|---|--------------|-------------|-----------------|-----------------|----------|----------|------------|------------------|
| | PM * | PM10** | PM2.5 | SO ₂ | NO _x | VOC | CO | Total HAPs | Worst Single HAP |
| Ductable Emissions | | | | | | | | | |
| Material Conveying | 1.97 | 0.72 | 0.72 | 0 | 0 | 0 | 0 | 0 | 0 |
| Fugitive Emissions * | | | | | | | | | |
| Processing and Handling | 51.27 | 24.25 | 3.67 | 0 | 0 | 0 | 0 | 0 | 0 |
| Storage Piles | 5.05 | 1.77 | 1.77 | 0 | 0 | 0 | 0 | 0 | 0 |
| Unpaved Roads | 262.50 | 66.90 | 1.73 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total PTE of Entire Source | 320.79 | 93.64 | 7.89 | 0 | 0 | 0 | 0 | 0 | 0 |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| N/A = not applicable * Fugitive Particulate Emissions are not counted toward PSD Applicability. See the "Fugitive Emissions" Section above, and additional explanation included in the "Note" below. ** 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". | | | | | | | | | |

(a) PSD Applicability

The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM, including fugitive and non-fugitive emissions, is greater than two hundred fifty (250) tons per year. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(gg)(1) (PSD), and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of Prevention of Significant Deterioration (PSD) (326 IAC 2-2) applicability. Therefore, the potential to emit particulate matter (PM) without the inclusion of fugitive emissions is one and ninety-seven hundredths (1.97) tons per year. Consequently, the requirements of 326 IAC 2-2 (PSD) still do not apply to the source and are not included in this renewal.

Note: Pursuant to 326 IAC 2-2-1(x), the term "fugitive particulate emission" refers to those emissions of particulate matter that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

Typical sources of fugitive particulate matter include paved and unpaved roads and parking lots, aggregate storage piles, and material transfer using trucks or front-end loaders. The material conveying system emissions are categorized as "ductable" because it is reasonably possible to enclose the units and capture their emissions.

Fugitive emissions are regulated at the State level through 326 IAC 6-4 (Fugitive Dust Emissions Limitations) and 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) as discussed under the "State Rule Applicability Determination" Section below. A copy of the fugitive dust control plan, required by 326 IAC 6-5, is included as Attachment A to the permit.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Coal Preparation and Processing Plants, 40 CFR 60, Subpart Y (326 IAC 12), are still not included in the permit, since this source does not meet the definition of a coal preparation and processing plant, as defined in § 60.251(e).
- (b) The requirements of the New Source Performance Standard for Lime Manufacturing Plants, 40 CFR 60, Subpart HH (326 IAC 12), are still not included in the permit, since this source does not manufacture a lime product, as defined in § 60.341(b).
- (c) The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO (326 IAC 12), are still not included in the permit, since this source does not meet the definition of a nonmetallic mineral processing plant, as defined in § 60.671
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Phosphate Fertilizers Production Plants, 40 CFR 63, Subpart BB (326 IAC 20-34), are still not included in the permit, since this source is not a major source of HAPs, and does not produce phosphate fertilizers.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Lime Manufacturing Plants, 40 CFR 63, Subpart AAAAA (5A) (326 IAC 20-91), are still not included in the permit, since this source is not a major source of HAPs, and does not manufacture a lime product, as defined in § 63.7143.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 source:

- (a) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Center Township, Dearborn County, has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Additionally, this existing river terminal is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than two and five tenths (2.5) micrometers (PM_{2.5}), is less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply, and are not included in this renewal.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
PSD applicability is discussed under the "Permit Level Determination – MSOP" section above.

- (c) 326 IAC 2-3 (Emission Offset)
Center Township, Dearborn County, has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Additionally, this existing stationary river terminal is still not considered a major source because the potential emissions for all criteria pollutants are less than the Title V Thresholds. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) still do not apply to this source, and are not included in this renewal.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is still an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1. Consequently, the requirements are still not included in this renewal.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is still not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is still only subject to additional information requests as provided in 436 IAC 2-6-5.
- (f) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the "Permit Level Determination – MSOP" section above.
- (g) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.
- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the conveyors, material handling and truck loading operations shall still not exceed fifty-five and forty-four hundredths (55.44) pounds per hour, combined, when operating at a process weight rate of one hundred fifty (150) tons, or 300,000 pounds, per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on the calculations in Appendix A, the combined uncontrolled potential PM emission rate, is:

$$58.29 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 13.31 \text{ lbs/hr}$$

The uncontrolled potential particulate emission rate from the conveyors, material handling, and truck loading operations, is thirteen and thirty-one hundredths (13.31) pounds per hour, combined, which is less than the allowable rate of fifty-five and forty-four hundredths (55.44) pounds per hour. Therefore, the conveyors, material handling, and truck loading operations are still in compliance with this rule.

- See Appendix A, for the detailed calculations.
- (i) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is still subject to the requirements of 326 IAC 6-4, because the material processing and handling, storage piles and unpaved roads, each, have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall continue to 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.
- (j) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is still subject to the requirements of 326 IAC 6-5, because the material processing and handling, storage piles and unpaved roads, combined, continue to have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall continue to be controlled according to the Fugitive Dust Control Plan, submitted on March 12, 1999, and revised March 29, 2010.
- Note: The following terms and conditions from previous approvals have been revised in this MSOP Renewal:
- The content of the fugitive dust plan, previously contained in conditions C.5: Fugitive Particulate Matter Emission Limitations [326 IAC 6-5] and D.1.2: Opacity [326 IAC 6-5], has been updated, March 29, 2010, and consolidated. The fugitive dust control plan is now included as Attachment A to the permit.
- (k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

Compliance Determination Requirements

The continuous wetting system for particulate control shall continue to be in operation and control emissions at all times while the loading and/or unloading of sand, gravel, crushed limestone, coal, coke, slag, and crushed glass is occurring.

Compliance Monitoring Requirements

The Permittee shall continue to perform daily visible emission notations of the storage piles, unpaved roads, and the material processing and handling operations, including each drop point, transfer point and unloading point, to ensure that particulate emissions are adequately controlled.

Testing Requirements

There continue to be no testing requirements applicable to this source.

Recordkeeping & Reporting Requirements

- (a) The permittee shall continue to maintain records of the daily visible emission notations for the storage piles, unpaved roads, and the material processing and handling operations, including each drop point, transfer point and unloading point.
- (b) The Permittee shall continue to maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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 February 9, 2010.

The continued operation of this source shall be subject to the conditions of the attached proposed MSOP Renewal, No. 029-28960-00031. The staff recommends to the Commissioner that this MSOP Renewal be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. 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**Emission Summary**

Company Name: Paul Rohe Company, Inc.
Source Address: 11048 Highway 56, Aurora, Indiana 47001
MSOP Renewal No: 029-28960-00031
Reviewer: Hannah Desrosiers
Date Submitted: 2/9/2010

| Uncontrolled Potential Emissions (tons/year) | | | | | | |
|---|-----------|-------------------------------|-----------------------|---------------|---------------|--------------|
| Category | Pollutant | Emissions Generating Activity | | | | TOTAL |
| | | Ductable* | Fugitive | | | |
| | | Material Conveying | Processing & Handling | Storage Piles | Unpaved Roads | |
| Criteria Pollutants | PM | 1.97 | 51.27 | 5.05 | 262.50 | 320.79 |
| | PM10 | 0.72 | 24.25 | 1.77 | 66.90 | 93.64 |
| | PM2.5 | 0.72 | 3.67 | 1.77 | 1.73 | 7.89 |
| | SO2 | 0 | 0 | 0 | 0 | 0.00 |
| | NOx | 0 | 0 | 0 | 0 | 0.00 |
| | VOC | 0 | 0 | 0 | 0 | 0.00 |
| | CO | 0 | 0 | 0 | 0 | 0.00 |
| | HAPs | 0 | 0 | 0 | 0 | 0.00 |

Total emissions based on rated capacity at 8,760 hours/year.

* Ductable emissions are those that could reasonable be collected and routed through a stack, chimney, vent, or other functionally equivalent opening.

**Appendix A: Unlimited Emissions Calculations
Material Processing, Handling, and Conveying**

Company Name: Paul Rohe Company, Inc.
Source Address: 11048 Highway 56, Aurora, Indiana 47001
MSOP Renewal No: 029-28960-00031
Reviewer: Hannah Desrosiers
Date Submitted: 2/9/2010

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) = | <u>0.74</u> | = particle size multiplier (0.74 assumed for aerodynamic diameter \leq 100 μ m) |
| k (PM10) = | <u>0.35</u> | = particle size multiplier (0.35 assumed for aerodynamic diameter \leq 10 μ m) |
| k (PM2.5) = | <u>0.053</u> | = particle size multiplier (0.053 assumed for aerodynamic diameter \leq 2.5 μ m) |
| U = | <u>10.2</u> | = worst case annual mean wind speed (Source: NOAA, 2006*) |
| M = | <u>0.7</u> | = worst case material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)** |
| E_f (PM) = | <u>2.60E-02</u> | lb PM/ton of material handled |
| E_f (PM10) = | <u>1.23E-02</u> | lb PM10/ton of material handled |
| E_f (PM2.5) = | <u>1.86E-03</u> | lb PM2.5/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) | Unlimited/Uncontrolled PTE of PM2.5 (tons/yr) |
|--|--|--|---|
| Barge off-loading: batch dropping with crane/clamshell | 17.09 | 8.08 | 1.22 |
| Truck unloading of materials into storage piles | 17.09 | 8.08 | 1.22 |
| Front-end loader dumping of materials into Trucks | 17.09 | 8.08 | 1.22 |
| Conveyor dropping material onto piles | 17.09 | 8.08 | 1.22 |
| Total (tons/yr) | 51.27 | 24.25 | 3.67 |

Methodology

Maximum Material Handling Throughput provided by the source as 150 tons/hr.

Maximum Material Handling Throughput (tons/yr) = Maximum Material Handling Throughput (tons/hr) * 8760 hrs/yr

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

Raw materials may include sand, gravel, limestone, crushed limestone, agricultural lime, coal, and other similar materials.

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

** Worst case material % moisture content of aggregate based on the crushed limestone, consistent with calculations from MSOP #029-20575-00031.

Material Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from raw material 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/PM2.5 (tons/yr)** |
|--|--|--|--|--|
| Conveying | 0.003 | 0.0011 | 1.97 | 0.72 |
| Unlimited Potential to Emit (tons/yr) = | | | 1.97 | 0.72 |

Methodology

Maximum Material Handling Throughput (tons/yr) provided by the source as 450 tons/hr.

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

Raw materials may include sand, gravel, limestone, crushed limestone, agricultural lime, coal, and other similar materials.

*Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2, Conveyor Transfer Point (SCC 3-05-020-06)

**Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 μ m)

PM2.5 = Particulate matter (< 2.5 μ m)

PTE = Potential to Emit

Appendix A: Emissions Calculations
Fugitive Dust Emissions - Material Storage Piles

Company Name: Paul Rohe Company, Inc.
Source Address: 11048 Highway 56, Aurora, Indiana 47001
MSOP Renewal No: 029-28960-00031
Reviewer: Hannah Desrosiers
Date Submitted: 2/9/2010

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.

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

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 (Ef) (lb/acre/day) | Maximum Anticipated Pile Size (acres)** | PTE of PM (tons/yr) | PTE of PM10*** (tons/yr) |
|------------------------|----------------------|------------------------------------|---|---------------------|--------------------------|
| Sand | 2.6 | 3.01 | 0.56 | 0.308 | 0.108 |
| Gravel | 1.6 | 1.85 | 0.50 | 0.169 | 0.059 |
| Crushed Limestone | 1.6 | 1.85 | 4.65 | 1.572 | 0.550 |
| Limestone | 1.0 | 1.16 | 1.84 | 0.389 | 0.136 |
| Agricultural Limestone | 3.9 | 4.51 | 1.00 | 0.824 | 0.288 |
| Coal | 6.2 | 7.18 | 0.53 | 0.694 | 0.243 |
| Other ^α | 5.3 | 6.13 | 0.98 | 1.097 | 0.384 |
| Totals | | | | 5.05 | 1.77 |

Abbreviations

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

Methodology

Limited PTE of PM (tons/yr) = [EF (lb/acre/day)] * [Maximum Pile Size (acres)] * (ton/2000 lbs) * (8760 hours/yr)

Limited 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 anticipated pile size (acres) provided by the source. Based on pile height of 25 feet.

*** In the absence of valid PM 2.5 emission factors, these emissions are assumed equal to PM10 emissions.

Note

^α Other material includes coke, fertilizer, salt, grain, slag, potash, and crushed glass. The silt content of slag was used to represent the worst case silt content.



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Daniel T Crago
Paul H. Rohe Company, Inc. - River Terminal
11641 Mosteller Road
Cincinnati, OH 45241

DATE: June 22, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP Renewal
029-28960-00031

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Patricia Stickney
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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

June 22, 2010

TO: Aurora Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Paul H. Rohe Company, Inc. - River Terminal
Permit Number: 029-28960-00031

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | GHOTOPP 6/22/2010 Paul H Rohe Co. Inc 029-28960-00031 final | | Type of Mail: CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Daniel T Crago Paul H Rohe Co, Inc 11641 Mosteller Rd Cincinnati OH 45241 (Source CAATS) via confirmed delivery | | | | | | | | | | |
| 2 | | Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 3 | | Aurora Public Library 414 Second St Aurora IN 47001-1384 (Library) | | | | | | | | | | |
| 4 | | Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official) | | | | | | | | | | |
| 5 | | Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department) | | | | | | | | | | |
| 6 | | Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 7 | | Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 8 | | Aurora City Council and Mayors Office P.O. Box 158 Aurora IN 47001 (Local Official) | | | | | | | | | | |
| 9 | | James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 10 | | Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 11 | | Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 12 | | Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 13 | | Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 14 | | Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party) | | | | | | | | | | |
| 15 | | Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party) | | | | | | | | | | |

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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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Mail Code 61-53

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| IDEM Staff | GHOTOPP 6/22/2010 Paul H Rohe Co. Inc 029-28960-00031 Final | | Type of Mail: CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|--|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Peter & Jody Franklin 9212 Hawksridge Dr. Covington KY 41017-9136 (Affected Party) | | | | | | | | | | |
| 2 | | Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party) | | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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