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

Mr. Edward Clements
Rieth-Riley Construction Co., Inc.
PO Box 477
Goshen, IN 46527

August 3, 2011

Re: Response to Review Request No. 097-30746-05319:
Permit status evaluation
Plant ID: 097-05319

Dear Mr. Clements:

Rieth-Riley Construction Co., Inc. was issued a FESOP No. 097-27199-05319 for construction and operation of a portable drum mix hot asphalt plant, to be located at 1751 West Minnesota Street, Indianapolis, Indiana 46221.

On July 28, 2011, the source notified OAQ that construction had not begun for the portable drum mix hot asphalt plant and requested that the commencement of construction time period for these units be extended to February 9, 2012.

Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke a construction approval, if construction is not commenced within 18 months of the original issuance date of that approval or if construction is suspended for a continuous period of one (1) year or more. However, OAQ excercises the discretion not to revoke FESOP No. 097-27199-05319 issued on February 9, 2010 and extends the construction period to February 9, 2012 based on the following evaluation:

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO_2 equivalent emissions (CO_2e). Therefore, CO_2e emissions have been calculated for this source. The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO_2e per year (see attached calculations). In addition, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in the permit, since the drum/dryer mixer and hot oil heater are not boilers as defined in 40 CFR 63.11237. As a result, there have been no changes in rule applicability in the interim, and there are no pending permits that will consume PSD increment for the local area.

No revision to the permit was necessary to accommodate the construction delay. All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter to the front of the original permit. A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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

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 Brian Williams, at (800) 451-6027, press 0 and ask for Brian Williams or extension 4-5375, or dial (317) 234-5375.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/BMW

cc: File - Marion County
U.S. EPA, Region V
Marion County Health Department
Compliance and Enforcement Branch

Appendix A.1: Unlimited Emissions Calculations
Entire Source

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

Asphalt Plant Maximum Capacity

Maximum Hourly Asphalt Production =	400	ton/hr								
Maximum Annual Asphalt Production =	3,504,000	ton/yr								
Maximum Annual Blast Furnace Slag Usage =	1,471,680	ton/yr	1.5	% sulfur						
Maximum Annual Steel Slag Usage =	1,471,680	ton/yr	1.5	% sulfur						
Maximum Dryer Fuel Input Rate =	100.0	MMBtu/hr								
Natural Gas Usage =	876	MMCF/yr								
No. 2 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
No. 4 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
Residual (No. 5 or No. 6) Fuel Oil Usage =	0	gal/yr, and	0.50	% sulfur						
Propane Usage =	9,679,558	gal/yr, and	0.20	gr/100 ft3 sulfur						
Butane Usage =	8,993,840	gal/yr, and	0.22	gr/100 ft3 sulfur						
Used/Waste Oil Usage =	6,257,143	gal/yr, and	1.00	% sulfur	1.02	% ash	0.400	% chlorine,	0.010	% lead
Unlimited PM Dryer/Mixer Emission Factor =	28.0	lb/ton of asphalt production								
Unlimited PM10 Dryer/Mixer Emission Factor =	6.5	lb/ton of asphalt production								
Unlimited PM2.5 Dryer/Mixer Emission Factor =	1.5	lb/ton of asphalt production								
Unlimited VOC Dryer/Mixer Emission Factor =	0.032	lb/ton of asphalt production								
Unlimited CO Dryer/Mixer Emission Factor =	0.13	lb/ton of asphalt production								
Unlimited Blast Furnace Slag SO2 Dryer/Mixer Emission Factor =	0.74	lb/ton of slag processed								
Unlimited Steel Slag SO2 Dryer/Mixer Emission Factor =	0.0014	lb/ton of slag processed								

Unlimited/Uncontrolled Emissions

	Unlimited/Uncontrolled Potential to Emit (tons/year)										
	Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
Process Description	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**CO_2e**	**Total HAPs**	**Worst Case HAP**	
Ducted Emissions											
Dryer Fuel Combustion (worst case)	204.23	162.75	162.75	459.90	147.04	4.95	37.77	75,816.58	86.42	82.59	(hydrogen chloride)
Dryer/Mixer (Process)	49,056.00	11,388.00	2,628.00	101.62	96.36	56.06	227.76	58,257.50	18.68	5.43	(formaldehyde)
Dryer/Mixer Slag Processing (worst case)	0	0	0	544.52	0	0	0	0.00	0	0	
Generator > 600	4.0	2.3	2.3	23.0	136.7	4.0	31.3	6,629.04	6.27E-02	3.09E-02	(benzene)
Generator < 600	0.92	0.92	0.92	0.86	13.00	1.05	2.80	483.72	1.14E-02	3.46E-03	(formaldehyde)
Hot Oil Heater Fuel Combustion (worst case)	0.07	0.12	0.12	2.55	0.72	0.01	0.18	813.16	0.003	0.002	(hexane)
Worst Case Emissions*	**49,060.98**	**11,391.32**	**2,631.32**	**1,030.87**	**297.41**	**61.14**	**262.06**	**83,742.51**	**86.50**	**82.59**	(hydrogen chloride)
Fugitive Emissions											
Asphalt Load-Out, Silo Filling, On-Site Yard	1.94	1.94	1.94	0	0	30.01	5.05	0	0.50	0.16	(formaldehyde)
Material Storage Piles	2.23	0.78	0.78	0	0	0	0	0	0	0	
Material Processing and Handling	11.32	5.35	0.81	0	0	0	0	0	0	0	
Material Crushing, Screening, and Conveying	55.59	20.31	20.31	0	0	0	0	0	0	0	
Unpaved and Paved Roads (worst case)	124.40	31.71	3.17	0	0	0	0	0	0	0	
Cold Mix Asphalt Production	0	0	0	0	0	42,109.32	0	0	10,983.67	3,789.84	(xylenes)
Gasoline Fuel Transfer and Dispensing	0	0	0	0	0	0.00	0	0	0.00	0.00	(xylenes)
Volatile Organic Liquid Storage Vessels	0	0	0	0	0	negl	0	0	negl	0	
Total Fugitive Emissions	**195.49**	**60.09**	**27.01**	**0.00**	**0.00**	**42,139.33**	**5.05**	**0.00**	**10,984.17**	**3,789.84**	(xylenes)
Totals Unlimited/Uncontrolled PTE	**49,256.47**	**11,451.41**	**2,658.33**	**1,030.87**	**297.41**	**42,200.47**	**267.11**	**83,742.51**	**11,070.67**	**3,789.84**	(xylenes)

negl = negligible
Worst Case Fuel Combustion is based on the fuel with the highest emissions for each specific pollutant.
*Worst Case Emissions (tons/yr) = Worst Case Emissions from Dryer Fuel Combustion and Dryer/Mixer + Worst Case Emissions From Dryer/Mixer Slag Processing + Generators + Worst Case Emissions from Hot Oil Heater Fuel Combustion
Fuel component percentages provided by the source.

Appendix A.1: Unlimited Emissions Calculations
Dryer/Mixer Fuel Combustion with Maximum Capacity > 100 MMBtu/hr

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

The following calculations determine the unlimited/uncontrolled emissions created from the combustion of natural gas, fuel oil, propane, butane, or used/waste oil in the dryer/mixer at the source.

Maximum Capacity

Maximum Hourly Asphalt Production =	400	ton/hr								
Maximum Annual Asphalt Production =	3,504,000	ton/yr								
Maximum Fuel Input Rate =	100	MMBtu/hr								
Natural Gas Usage =	876	MMCF/yr								
No. 2 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
No. 4 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
Residual (No. 5 or No. 6) Fuel Oil Usage =	0	gal/yr, and	0.50	% sulfur						
Propane Usage =	9,679,558	gal/yr, and	0.20	gr/100 ft3 sulfur						
Butane Usage =	8,993,840	gal/yr, and	0.22	gr/100 ft3 sulfur						
Used/Waste Oil Usage =	6,257,143	gal/yr, and	1.00	% sulfur	1.02	% ash	0.400	% chlorine,	0.010	% lead

Unlimited/Uncontrolled Emissions

	Emission Factor (units)							Unlimited/Uncontrolled Potential to Emit (tons/yr)							
Criteria Pollutant	Natural Gas (lb/MMCF)	No. 2 Fuel Oil (lb/kgal)	No. 4 Fuel Oil* (lb/kgal)	Residual (No. 5 or No. 6) Fuel Oil (lb/kgal)	Propane (lb/kgal)	Butane (lb/kgal)	Used/ Waste Oil (lb/kgal)	Natural Gas (tons/yr)	No. 2 Fuel Oil (tons/yr)	No. 4 Fuel Oil (tons/yr)	Residual (No. 5 or No. 6) Fuel Oil (tons/yr)	Propane (tons/yr)	Butane (tons/yr)	Used/ Waste Oil (tons/yr)	**Worse Case Fuel (tons/yr)**
PM	1.9	2.0	7.0	7.815	0.5	0.6	65.3	0.83	6.26	21.90	0.00	2.420	2.698	204.23	**204.23**
PM10/PM2.5	7.6	3.3	8.3	9.315	0.5	0.6	52.02	3.33	10.32	25.97	0.00	2.420	2.698	162.75	**162.75**
SO2	0.6	71.0	75.0	78.5	0.020	0.020	147.0	0.26	222.13	234.64	0.00	0.097	0.089	459.90	**459.90**
NOx	190	24.0	47.0	47.0	13.0	15.0	19.0	83.22	75.09	147.04	0.00	62.92	67.45	59.44	**147.04**
VOC	5.5	0.20	0.20	0.28	1.00	1.10	1.0	2.41	0.63	0.63	0.00	4.84	4.95	3.13	**4.95**
CO	84	5.0	5.0	5.0	7.5	8.4	5.0	36.792	15.64	15.64	0.00	36.30	37.77	15.64	**37.77**
Hazardous Air Pollutant															
HCl							26.4							82.59	**82.59**
Antimony			5.25E-03	5.25E-03			negl			1.64E-02	0.00E+00			negl	**1.6E-02**
Arsenic	2.0E-04	5.6E-04	1.32E-03	1.32E-03			1.1E-01	8.8E-05	1.75E-03	4.13E-03	0.00E+00			3.44E-01	**3.4E-01**
Beryllium	1.2E-05	4.2E-04	2.78E-05	2.78E-05			negl	5.3E-06	1.31E-03	8.70E-05	0.00E+00			negl	**1.3E-03**
Cadmium	1.1E-03	4.2E-04	3.98E-04	3.98E-04			9.3E-03	4.8E-04	1.31E-03	1.25E-03	0.00E+00			2.91E-02	**2.9E-02**
Chromium	1.4E-03	4.2E-04	8.45E-04	8.45E-04			2.0E-02	6.1E-04	1.31E-03	2.64E-03	0.00E+00			6.26E-02	**6.3E-02**
Cobalt	8.4E-05		6.02E-03	6.02E-03			2.1E-04	3.7E-05		1.88E-02	0.00E+00			6.57E-04	**1.9E-02**
Lead	5.0E-04	1.3E-03	1.51E-03	1.51E-03			0.55	2.2E-04	3.94E-03	4.72E-03	0.00E+00			1.7E+00	**1.72**
Manganese	3.8E-04	8.4E-04	3.00E-03	3.00E-03			6.8E-02	1.7E-04	2.63E-03	9.39E-03	0.00E+00			2.13E-01	**0.21**
Mercury	2.6E-04	4.2E-04	1.13E-04	1.13E-04				1.1E-04	1.31E-03	3.54E-04	0.00E+00				**1.3E-03**
Nickel	2.1E-03	4.2E-04	8.45E-02	8.45E-02			1.1E-02	9.2E-04	1.31E-03	2.64E-01	0.00E+00			3.44E-02	**0.264**
Selenium	2.4E-05	2.1E-03	6.83E-04	6.83E-04			negl	1.1E-05	6.57E-03	2.14E-03	0.00E+00			negl	**6.6E-03**
1.1.1-Trichloroethane			2.36E-04	2.36E-04						7.38E-04	0.00E+00				**7.4E-04**
1,3-Butadiene															**0.0E+00**
Acetaldehyde															**0.0E+00**
Acrolein															**0.0E+00**
Benzene	2.1E-03		2.14E-04	2.14E-04				9.2E-04		6.70E-04	0.00E+00				**9.2E-04**
Bis(2-ethylhexyl)phthalate							2.2E-03							6.88E-03	**6.9E-03**
Dichlorobenzene	1.2E-03						8.0E-07	5.3E-04						2.50E-06	**5.3E-04**
Ethylbenzene			6.36E-05	6.36E-05						1.99E-04	0.00E+00				**2.0E-04**
Formaldehyde	7.5E-02	6.10E-02	3.30E-02	3.30E-02				3.3E-02	1.91E-01	1.03E-01	0.00E+00				**0.191**
Hexane	1.8E+00							0.79							**0.788**
Phenol							2.4E-03							7.51E-03	**7.5E-03**
Toluene	3.4E-03		6.20E-03	6.20E-03				1.5E-03		1.94E-02	0.00E+00				**1.9E-02**
Total PAH Haps	negl		1.13E-03	1.13E-03			3.9E-02	negl		3.54E-03	0.00E+00			1.22E-01	**1.2E-01**
Polycyclic Organic Matter		3.30E-03							1.03E-02						**1.0E-02**
Xylene			1.09E-04	1.09E-04						3.41E-04	0.00E+00				**3.4E-04**
							Total HAPs	**0.83**	**0.22**	**0.45**	**0.00**	**0**	**0**	**85.14**	**86.42**

Methodology

Natural Gas Usage (MMCF/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 MMCF/1,000 MMBtu]
Oil Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.140 MMBtu]
Propane Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.0905 MMBtu]
Butane Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.0974 MMBtu]
Natural Gas: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Natural Gas Usage (MMCF/yr)] * [Emission Factor (lb/MMCF)] * [ton/2000 lbs]
All Other Fuels: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Fuel Usage (gals/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gal] * [ton/2000 lbs]
Sources of AP-42 Emission Factors for fuel combustion:
Natural Gas : AP-42 Chapter 1.4 (dated 7/98), Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4
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
Propane and Butane: AP-42 Chapter 1.5 (dated 7/08), Tables 1.5-1 (assuming PM = PM10)
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
*Since there are no specific AP-42 HAP emission factors for combustion of No. 4 fuel oil, it was assumed that HAP emissions from combustion of No. 4 fuel oil were equal to combustion of residual or No. 6 fuel oil.

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (< 2.5 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide
HAP = Hazardous Air Pollutant
HCl = Hydrogen Chloride
PAH = Polyaromatic Hydrocarbon

Appendix A.1: Unlimited Emissions Calculations
Greenhouse Gas (CO2e) Emissions from the
Dryer/Mixer Fuel Combustion with Maximum Capacity ≥ 100 MMBtu/hr

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

The following calculations determine the unlimited/uncontrolled emissions created from the combustion of natural gas, fuel oil, propane, butane, or used/waste oil in the dryer/mixer at the source.

Maximum Capacity

Maximum Hourly Asphalt Production =	400	ton/hr								
Maximum Annual Asphalt Production =	3,504,000	ton/yr								
Maximum Fuel Input Rate =	100	MMBtu/hr								
Natural Gas Usage =	876	MMCF/yr								
No. 2 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
No. 4 Fuel Oil Usage =	6,257,143	gal/yr, and	0.50	% sulfur						
Refinery Blend, and Residual (No. 5 or No. 6) Fuel Oil Usage =	0	gal/yr, and	0.50	% sulfur						
Propane Usage =	9,679,558	gal/yr, and	0.20	gr/100 ft3 sulfur						
Butane Usage =	8,993,840	gal/yr, and	0.22	gr/100 ft3 sulfur						
Used/Waste Oil Usage =	6,257,143	gal/yr, and	1.00	% sulfur	1.02	% ash	0.400	% chlorine,	0.010	% lead

Unlimited/Uncontrolled Emissions

	Emission Factor (units)						
CO2e Fraction	Natural Gas (lb/MMCF)	No. 2 Fuel Oil (lb/kgal)	No. 4 Fuel Oil (lb/kgal)	Residual (No. 5 or No. 6) Fuel Oil (lb/kgal)	Propane (lb/kgal)	Butane (lb/kgal)	Used/Waste Oil (lb/kgal)
CO2	120,161.84	22,501.41	24,153.46	24,835.04	12,500.00	14,506.73	22,024.15
CH4	2.49	0.91	0.97	1.00	0.60	0.67	0.89
N2O	2.2	0.26	0.19	0.53	0.9	0.9	0.18

Greenhouse Warming Potentials (GWP)		
Name	Chemical Formula	Global warming potential
Carbon dioxide	CO_2	1
Methane	CH_4	21
Nitrous oxide	N_2O	310

	Unlimited/Uncontrolled Potential to Emit (tons/yr)						
CO2e Fraction	Natural Gas (tons/yr)	No. 2 Fuel Oil (tons/yr)	No. 4 Fuel Oil (tons/yr)	Residual (No. 5 or No. 6) Fuel Oil (tons/yr)	Propane (tons/yr)	Butane (tons/yr)	Used/ Waste Oil (tons/yr)
CO2	52,630.89	70,397.27	75565.84	0.00	60497.24	65235.60	68,904.14
CH4	1.09	2.86	3.02	0.00	2.91	3.00	2.79
N2O	0.96	0.81	0.60	0.00	4.36	4.05	0.56
Total	52,632.94	70,400.94	75,569.46	0.00	60,504.51	65,242.66	68,907.49
CO2e Equivalent Emissions (tons/yr)	52,952.54	70,709.41	75,816.58	0.00	61,908.71	66,553.33	69,137.37

CO2e for Worst Case Fuel* (tons/yr)
75,816.58

Methodology
Fuel Usage from TSD Appendix A.1, page 1 of 14.
Natural Gas Usage (MMCF/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 MMCF/1,000 MMBtu]
Fuel Oil Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.140 MMBtu]
Propane Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.0915 MMBtu]
Butane Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.102 MMBtu]
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Sources of Emission Factors for fuel combustion: (Note: To form a conservative estimate, the "worst case" emission factors have been used.)

Natural Gas: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/MMCF. Emission Factor for N2O from AP-42 Chapter 1.4 (dated 7/98), Table 1.4-2
No. 2 Fuel Oil: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/kgal. Emission Factor for N2O from AP-42 Chapter 1.3 (dated 9/98), Table 1.3-8
No.4 Fuel Oil: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/kgal. Emission Factor for N2O from AP-42 Chapter 1.3 (dated 9/98), Table 1.3-8
Residual (No. 5 or No. 6) Fuel Oil: Emission Factor for CO2 from 40 CFR Part 98 Subpart C, Table C-1, has been converted from kg/mmBtu to lb/kgal. Emission Factors for CH4 and N2O from AP-42 Chapter 1.3 (dated 9/98), Table 1.3-8
Propane: Emission Factor for CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, has been converted from kg/mmBtu to lb/kgal. Emission Factors for CO2 and N2O from AP-42 Chapter 1.5 (dated 7/08), Table 1.5-1
Butane: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/kgal. Emission Factor for N2O from AP-42 Chapter 1.5 (dated 7/08), Table 1.5-1
Waste Oil: Emission Factors for CO2, CH4, and N2O from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/kgal.

Emission Factor (EF) Conversions
Natural Gas: EF (lb/MMCF) = [EF (kg/MMBtu) * Conversion Factor (2.20462 lbs/kg) * Heating Value of Natural Gas (MMBtu/scf) * Conversion Factor (1,000,000 scf/MMCF)]
Fuel Oils: EF (lb/kgal) = [EF (kg/MMBtu) * Conversion Factor (2.20462 lbs/kg) * Heating Value of the Fuel Oil (MMBtu/gal) * Conversion Factor (1000 gal/kgal)]

Natural Gas: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Natural Gas Usage (MMCF/yr)] * [Emission Factor (lb/MMCF)] * [ton/2000 lbs]
All Other Fuels: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Fuel Usage (gals/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gal] * [ton/2000 lbs]
Unlimited Potential to Emit CO2e (tons/yr) = Unlimited Potential to Emit CO2 of "worst case" fuel (ton/yr) x CO2 GWP (1) + Unlimited Potential to Emit CH4 of "worst case" fuel (ton/yr) x CH4 GWP (21) + Unlimited Potential to Emit N2O of "worst case" fuel (ton/yr) x N2O GWP (310).

Abbreviations
PTE = Potential to Emit
CO2 = Carbon Dioxide
CH4 = Methane
N2O = Nitrogen Dioxide

Appendix A.1: Unlimited Emissions Calculations
Dryer/Mixer

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

The following calculations determine the unlimited/uncontrolled emissions from the aggregate drying/mixing

Maximum Hourly Asphalt Production = 400 ton/hr
Maximum Annual Asphalt Production = 3,504,000 ton/yr

	Uncontrolled Emission Factors (lb/ton)			Unlimited/Uncontrolled Potential to Emit (tons/yr)			
	Drum-Mix Plant (dryer/mixer)			Drum-Mix Plant (dryer/mixer)			
Criteria Pollutant	Natural Gas	No. 2 Fuel Oil	Waste Oil	Natural Gas	No. 2 Fuel Oil	Waste Oil	**Worse Case PTE**
PM*	28	28	28	49056	49056	49056	**49056**
PM10*	6.5	6.5	6.5	11388	11388	11388	**11388**
PM2.5*	1.5	1.5	1.5	2628	2628	2628	**2628**
SO2**	0.0034	0.011	0.058	6.0	19.3	101.6	**101.6**
NOx**	0.026	0.055	0.055	45.6	96.4	96.4	**96.4**
VOC**	0.032	0.032	0.032	56.1	56.1	56.1	**56.1**
CO***	0.13	0.13	0.13	227.8	227.8	227.8	**227.8**
Hazardous Air Pollutant							
HCl			2.10E-04			3.68E-01	**0.37**
Antimony	1.80E-07	1.80E-07	1.80E-07	3.15E-04	3.15E-04	3.15E-04	**3.15E-04**
Arsenic	5.60E-07	5.60E-07	5.60E-07	9.81E-04	9.81E-04	9.81E-04	**9.81E-04**
Beryllium	negl	negl	negl	negl	negl	negl	**0.00E+00**
Cadmium	4.10E-07	4.10E-07	4.10E-07	7.18E-04	7.18E-04	7.18E-04	**7.18E-04**
Chromium	5.50E-06	5.50E-06	5.50E-06	9.64E-03	9.64E-03	9.64E-03	**9.64E-03**
Cobalt	2.60E-08	2.60E-08	2.60E-08	4.56E-05	4.56E-05	4.56E-05	**4.56E-05**
Lead	6.20E-07	1.50E-05	1.50E-05	1.09E-03	2.63E-02	2.63E-02	**2.63E-02**
Manganese	7.70E-06	7.70E-06	7.70E-06	1.35E-02	1.35E-02	1.35E-02	**1.35E-02**
Mercury	2.40E-07	2.60E-06	2.60E-06	4.20E-04	4.56E-03	4.56E-03	**4.56E-03**
Nickel	6.30E-05	6.30E-05	6.30E-05	0.11	0.11	0.11	**0.11**
Selenium	3.50E-07	3.50E-07	3.50E-07	6.13E-04	6.13E-04	6.13E-04	**6.13E-04**
2,2,4 Trimethylpentane	4.00E-05	4.00E-05	4.00E-05	0.07	0.07	0.07	**0.07**
Acetaldehyde			1.30E-03			2.28	**2.28**
Acrolein			2.60E-05			4.56E-02	**4.56E-02**
Benzene	3.90E-04	3.90E-04	3.90E-04	0.68	0.68	0.68	**0.68**
Ethylbenzene	2.40E-04	2.40E-04	2.40E-04	0.42	0.42	0.42	**0.42**
Formaldehyde	3.10E-03	3.10E-03	3.10E-03	5.43	5.43	5.43	**5.43**
Hexane	9.20E-04	9.20E-04	9.20E-04	1.61	1.61	1.61	**1.61**
Methyl chloroform	4.80E-05	4.80E-05	4.80E-05	0.08	0.08	0.08	**0.08**
MEK			2.00E-05			0.04	**0.04**
Propionaldehyde			1.30E-04			0.23	**0.23**
Quinone			1.60E-04			0.28	**0.28**
Toluene	1.50E-04	2.90E-03	2.90E-03	0.26	5.08	5.08	**5.08**
Total PAH Haps	1.90E-04	8.80E-04	8.80E-04	0.33	1.54	1.54	**1.54**
Xylene	2.00E-04	2.00E-04	2.00E-04	0.35	0.35	0.35	**0.35**
						Total HAPs	**18.68**
						Worst Single HAP	**5.43** **(formaldehyde)**

Methodology
Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual Asphalt Production (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
Natural gas, No. 2 fuel oil, and waste oil represent the worst possible emissions scenario. AP-42 did not provide emission factors for any other fuels.

* PM, PM10, and PM2.5 AP-42 emission factors based on drum mix dryer fired with natural gas, propane, fuel oil, and waste oil. According to AP-42 fuel type does not significantly effect PM, PM10, and PM2.5 emissions.

** SO2, NOx, and VOC AP-42 emission factors are for natural gas, No. 2 fuel oil, and waste oil only.

*** CO AP-42 emission factor determined by combining data from drum mix dryer fired with natural gas, No. 6 fuel oil, and No. 2 fuel oil to develop single CO emission factor.

Abbreviations
VOC - Volatile Organic Compounds
HCl = Hydrogen Chloride
SO2 = Sulfur Dioxide
HAP = Hazardous Air Pollutant
PAH = Polyaromatic Hydrocarbon

Appendix A.1: Unlimited Emissions Calculations
Greenhouse Gas (CO2e) Emissions from the
Drum-Mix Plant (Dryer/Mixer) Process Emissions

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

The following calculations determine the unlimited/uncontrolled emissions from the aggregate drying/mixing

Maximum Hourly Asphalt Production = 400 ton/hr
Maximum Annual Asphalt Production = 3,504,000 ton/yr

	Emission Factor (lb/ton) Drum-Mix Plant (dryer/mixer)			Greenhouse Gas Global Warming Potentials (GWP)	Unlimited/Uncontrolled Potential to Emit (tons/yr) Drum-Mix Plant (dryer/mixer)			
Criteria Pollutant	Natural Gas	No. 2 Fuel Oil	Waste Oil		Natural Gas	No. 2 Fuel Oil	Waste Oil	**CO2e for Worst Case Fuel (tons/yr)**
CO2	33	33	33	1	57,816.00	57,816.00	57,816.00	**58,257.50**
CH4	0.0120	0.0120	0.0120	21	21.02	21.02	21.02	
N2O				310	0	0	0	
				Total	57,837.02	57,837.02	57,837.02	
				CO2e Equivalent Emissions (tons/yr)	58,257.50	58,257.50	58,257.50	

Methodology
Natural gas, No. 2 fuel oil, and waste oil represent the worst possible emissions scenario. AP-42 did not provide emission factors for any other fuels.
Emission Factors from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-7 and 11.1-8
There are no emission factors for N20 available in either the 40 CFR 98, Subpart C or AP-42 Chapter 11.1. Therefore, it is assumed that there are no N2O emission anticipated from this process.

Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual Asphalt Production (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
Unlimited Potential to Emit CO2e (tons/yr) = Unlimited Potential to Emit CO2 of "worst case" fuel (ton/yr) x CO2 GWP (1) + Unlimited Potential to Emit CH4 of "worst case" fuel (ton/yr) x CH4 GWP (21) + Unlimited Potential to Emit N2O of "worst case" fuel (ton/yr) x N2O GWP (310).

Abbreviations
CO2 = Carbon Dioxide CH4 = Methane N2O = Nitrogen Dioxide PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Dryer/Mixer Slag Processing

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

The following calculations determine the unlimited emissions from the processing of slag in the aggregate drying/mixing

Maximum Annual Blast Furnace Slag Usage* =	1,471,680	ton/yr	1.5	% sulfur
Maximum Annual Steel Slag Usage* =	1,471,680	ton/yr	1.5	% sulfur

Type of Slag	SO2 Emission Factor (lb/ton)**	Unlimited Potential to Emit SO2 (tons/yr)
Blast Furnace Slag	0.74	544.5
Steel Slag	0.0014	1.03

Methodology
* The maximum annual slag usage was provided by the source.
** Testing results for blast furnace slag, obtained January 9, 2009 from similar operations at Rieth-Riley Construction Co., Inc. facility located in Valparaiso, IN (permit #127-27075-

** Testing results for steel slag, obtained June 2009 from E & B Paving, Inc. facility located in Huntington, IN. The testing results showed a steel slag emission factor of 0.0007 lb/ton from slag containing 0.33% sulfur content.
Unlimited Potential to Emit SO2 from Slag (tons/yr) = [(Maximum Annual Slag Usage (ton/yr)] * [Emission Factor (lb/ton)] * [ton/2000 lbs]
Abbreviations
SO2 = Sulfur Dioxide

Appendix A.1: Emission Calculations

Internal Combustion Engines - Diesel Fuel

Generator (>600 HP) Unlimited Emissions

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

Generator Maximum Hours of Operation =	8760	hr/yr
Diesel Engine Oil Usage =	581,741	gal/yr

S= 0.50 = WEIGHT % SULFUR

Heat Input Capacity Horsepower (hp)	hp-hr/yr
1300.0	11388000.0

	Pollutant						
	PM	PM10*	direct PM2.5*	SO2	NOx**	VOC	CO
Emission Factor in lb/hp-hr	7.00E-04	4.01E-04	4.01E-04	4.05E-03	0.024	7.05E-04	5.50E-03
or				*(.00809S)*	**see below		
Emission Factor in lb/gal***	1.37E-02	7.85E-03	7.85E-03	0.0792	0.47	0.01	0.11
Potential Emission in tons/yr	4.0	2.3	2.3	23.0	136.7	4.0	31.3
or							
Potential Emission in tons/yr	4.0	2.3	2.3	23.0	136.7	4.0	31.3

Hazardous Air Pollutants (HAPs)

	Pollutant						
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs****
Emission Factor in lb/hp-hr*****	5.43E-06	1.97E-06	1.35E-06	5.52E-07	1.76E-07	5.52E-08	1.48E-06
Potential Emission in tons/yr	3.09E-02	1.12E-02	7.69E-03	3.14E-03	1.00E-03	3.14E-04	8.45E-03

****PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
*****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**6.27E-02**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	1.16	6.35E-05	9.30E-06
Potential Emission in tons/yr	6,605.04	0.36	0.05

Summed Potential Emissions in tons/yr	**6,605.45**
CO2e Total in tons/yr	**6,629.04**

Methodology

* Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.
Average heating value of diesel was assumed to be 19,300 Btu/lb, with a density of 7.1 lb/gal (AP42 (Supplement B 10/96), Table 3.4-1, Footnote a).
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.4-1, Footnote e.
*PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and an average conversion factor of (7,000 Btu / hp-hr).
No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included.
The PM10 emission factor is filterable and condensable PM10 combined. The PM2.5 emissions were assumed to be equal to PM10.
**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
***Emission Factor in lb/gal = AP-42 emission factor (lb/hp-hr) * 1/7000 (hp-hr/btu) * 1/19300 (lb/btu) * 1/7.1 (gal/lb)
Potential Throughput (hp-hr/yr) = hp * 8760 hr/year
Potential Throughput (gal/yr) = 1300 (hp) * 8760 (hr/yr) * 7000 (Btu/hp-hr) * 1/19300 (lb/Btu) * 1/7.1 (gal/lb)
Potential Emissions (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
or
Potential Emissions (tons/yr) = [Potential Throughput (gal/yr) x Emission Factor (lb/gal)] / (2,000 lb/ton)
CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A.1: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Generator (<600 HP) Unlimited Emissions

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

Generator Maximum Hours of Operation =	8760	hr/yr
Diesel Engine Oil Usage =	42,831	gal/yr

Heat Input Capacity Horsepower (hp)	hp-hr/yr
95.7	838457.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.92	0.92	0.92	0.86	13.00	1.05	2.80
Emission Factor in lb/gal***	0.04	0.04	0.04	0.04	0.61	0.05	0.13
Potential Emission in tons/yr	0.92	0.92	0.92	0.86	13.00	1.05	2.80

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs****
Emission Factor in lb/hp-hr*****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.74E-03	1.20E-03	8.36E-04	1.15E-04	3.46E-03	2.25E-03	2.71E-04	4.93E-04

****PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
*****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**1.14E-02**

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	1.15	4.63E-05	9.26E-06
Potential Emission in tons/yr	482.11	0.019	0.0039

Summed Potential Emissions in tons/yr	**482.14**
CO2e Total in tons/yr	**483.72**

Methodology
Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2
***Emission Factor in lb/gal = AP-42 emission factor (lb/hp-hr) * 1/7000 (hp-hr/btu) * 1/19300 (lb/btu) * 1/7.1 (gal/lb)
CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Throughput (gal/yr) = 95.7 (hp) * 8760 (hr/yr) * 7000 (Btu/hp-hr) * 1/19300 (lb/Btu) * 1/7.1 (gal/lb)
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
or
Potential Emissions (tons/yr) = [Potential Throughput (gal/yr) x Emission Factor (lb/gal)] / (2,000 lb/ton)
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A.1: Unlimited Emissions Calculations
Hot Oil Heater
Fuel Combustion with Maximum Capacity < 100 MMBtu/hr

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Location: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

Maximum Hot Oil Heater Fuel Input Rate =	1.15	MMBtu/hr		
Natural Gas Usage =	0	MMCF/yr		
No. 2 Fuel Oil Usage =	71,957	gal/yr, and	0.50	% sulfur

Unlimited/Uncontrolled Emissions

	Emission Factor (units)		Unlimited/Uncontrolled Potential to Emit (tons/yr)		
	Hot Oil Heater		Hot Oil Heater		
Criteria Pollutant	Natural Gas (lb/MMCF)	No. 2 Fuel Oil (lb/kgal)	Natural Gas (tons/yr)	No. 2 Fuel Oil (tons/yr)	**Worse Case Fuel (tons/yr)**
PM	1.9	2.0	0.000	0.072	**0.07**
PM10/PM2.5	7.6	3.3	0.000	0.119	**0.12**
SO2	0.6	71.0	0.000	2.554	**2.55**
NOx	100	20.0	0.000	0.720	**0.72**
VOC	5.5	0.20	0.000	0.007	**0.01**
CO	84	5.0	0.000	0.180	**0.18**
Hazardous Air Pollutant					
Arsenic	2.0E-04	5.6E-04	0.0E+00	2.01E-05	**2.0E-05**
Beryllium	1.2E-05	4.2E-04	0.0E+00	1.51E-05	**1.5E-05**
Cadmium	1.1E-03	4.2E-04	0.0E+00	1.51E-05	**1.5E-05**
Chromium	1.4E-03	4.2E-04	0.0E+00	1.51E-05	**1.5E-05**
Cobalt	8.4E-05		0.0E+00		**0.0E+00**
Lead	5.0E-04	1.3E-03	0.0E+00	4.53E-05	**4.5E-05**
Manganese	3.8E-04	8.4E-04	0.0E+00	3.02E-05	**3.0E-05**
Mercury	2.6E-04	4.2E-04	0.0E+00	1.51E-05	**1.5E-05**
Nickel	2.1E-03	4.2E-04	0.0E+00	1.51E-05	**1.5E-05**
Selenium	2.4E-05	2.1E-03	0.0E+00	7.56E-05	**7.6E-05**
Benzene	2.1E-03		0.0E+00		**0.0E+00**
Dichlorobenzene	1.2E-03		0.0E+00		**0.0E+00**
Ethylbenzene					**0.0E+00**
Formaldehyde	7.5E-02	6.10E-02	0.0E+00	2.19E-03	**2.2E-03**
Hexane	1.8E+00		0.00		**0.0E+00**
Phenol					**0.0E+00**
Toluene	3.4E-03		0.0E+00		**0.0E+00**
Total PAH Haps	negl		negl		**0.0E+00**
Polycyclic Organic Matter		3.30E-03		1.19E-04	**1.2E-04**
		Total HAPs =	**0.0E+00**	**2.6E-03**	**0.003**

Methodology
Equivalent Natural Gas Usage (MMCF/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 MMCF/1,000 MMBtu]
Equivalent Oil Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.140 MMBtu]
Natural Gas: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Natural Gas Usage (MMCF/yr)] * [Emission Factor (lb/MMCF)] * [ton/2000 lbs]
All Other Fuels: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Fuel Usage (gals/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gal] * [ton/2000 lbs]
Sources of AP-42 Emission Factors for fuel combustion:
Natural Gas : AP-42 Chapter 1.4 (dated 7/98), Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4
No. 2 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

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

Appendix A.1: Unlimited Emissions Calculations
Greenhouse Gas (CO2e) Emissions from
Hot Oil Heater Fuel Combustion with Maximum Capacity < 100 MMBtu/hr

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

Maximum Hot Oil Heater Fuel Input Rate =	1.15	MMBtu/hr		
Natural Gas Usage =	0.00	MMCF/yr		
No. 2 Fuel Oil Usage =	71,957.14	gal/yr,	0.50	% sulfur

Unlimited/Uncontrolled Emissions

Criteria Pollutant	Emission Factor (units) Natural Gas (lb/MMCF)	Emission Factor (units) No. 2 Fuel Oil (lb/kgal)	Greenhouse Global Warming Potentials (GWP)	Potential to Emit (tons/yr) Natural Gas (tons/yr)	Potential to Emit (tons/yr) No. 2 Fuel Oil (tons/yr)	**Worse Case CO2e Emissions (tons/yr)**
CO2	120,161.84	22,501.41	1	0.00	809.57	**813.16**
CH4	2.49	0.91	21	0.00	0.03	
N2O	2.2	0.26	310	0.00	0.01	
				0.00	809.61	
CO2e Equivalent Emissions (tons/yr)				0.00	813.16	

Methodology

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Equivalent Natural Gas Usage (MMCF/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 MMCF/1,000 MMBtu]
Equivalent Oil Usage (gal/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] * [8,760 hrs/yr] * [1 gal/0.140 MMBtu]
Sources of Emission Factors for fuel combustion: (Note: To form a conservative estimate, the "worst case" emission factors have been used.)

Natural Gas: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu
No. 2 Fuel Oil: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu
Propane: Emission Factor for CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, has been converted from kg/mmBtu to lb/kgal.
Butane: Emission Factors for CO2 and CH4 from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu

Emission Factor (EF) Conversions

Natural Gas: EF (lb/MMCF) = [EF (kg/MMBtu) * Conversion Factor (2.20462 lbs/kg) * Heating Value of Natural Gas (MMBtu/scf)
Fuel Oils: EF (lb/kgal) = [EF (kg/MMBtu) * Conversion Factor (2.20462 lbs/kg) * Heating Value of the Fuel Oil (MMBtu/gal) *

Natural Gas: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Natural Gas Usage (MMCF/yr)] * [Emission Factor (lb/MMCF)] *
All Other Fuels: Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Fuel Usage (gals/yr)] * [Emission Factor (lb/kgal)] * [kgal/1000 gal] *
Unlimited Potential to Emit CO2e (tons/yr) = Unlimited Potential to Emit CO2 of "worst case" fuel (ton/yr) x CO2 GWP (1) + Unlimited Potential to

Abbreviations

CO2 = Carbon Dioxide
CH4 = Methane
N2O = Nitrogen Dioxide
PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Asphalt Load-Out, Silo Filling, and Yard Emissions

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

The following calculations determine the unlimited/uncontrolled fugitive emissions from hot asphalt mix load-out, silo filling, and on-site yard for a drum mix hot mix asphalt plant

Asphalt Temperature, T =	325	F
Asphalt Volatility Factor, V =	-0.5	
Maximum Annual Asphalt Production =	3,504,000	tons/yr

	Emission Factor (lb/ton asphalt)			Unlimited/Uncontrolled Potential to Emit (tons/yr)			
Pollutant	**Load-Out**	**Silo Filling**	**On-Site Yard**	**Load-Out**	**Silo Filling**	**On-Site Yard**	**Total**
Total PM*	5.2E-04	5.9E-04	NA	0.91	1.03	NA	**1.94**
Organic PM	3.4E-04	2.5E-04	NA	0.60	0.445	NA	**1.04**
TOC	0.004	0.012	0.001	7.29	21.35	1.927	**30.6**
CO	0.001	0.001	3.5E-04	2.36	2.067	0.617	**5.05**

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

PM/HAPs	**0.042**	**0.050**	**0**	**0.093**
VOC/HAPs	**0.108**	**0.272**	**0.028**	**0.408**
non-VOC/HAPs	**5.6E-04**	**5.8E-05**	**1.5E-04**	**7.7E-04**
non-VOC/non-HAPs	**0.53**	**0.30**	**0.14**	**0.97**

Total VOCs	**6.85**	**21.35**	**1.8**	**30.0**
Total HAPs	**0.15**	**0.32**	**0.029**	**0.50**
			Worst Single HAP	**0.155 (formaldehyde)**

Methodology
The asphalt temperature and volatility factor were provided by the source.
Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual Asphalt Production (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)::
Total PM/PM10/PM2.5 Ef = 0.000181 + 0.00141(-V)e^((0.0251)(T+460)-20.43)
Organic PM Ef = 0.00141(-V)e^((0.0251)(T+460)-20.43)
TOC Ef = 0.0172(-V)e^((0.0251)(T+460)-20.43)
CO Ef = 0.00558(-V)e^((0.0251)(T+460)-20.43)
Silo Filling Emission Factor Equations (AP-42 Table 11.1-14):
PM/PM10 Ef = 0.000332 + 0.00105(-V)e^((0.0251)(T+460)-20.43)
Organic PM Ef = 0.00105(-V)e^((0.0251)(T+460)-20.43)
TOC Ef = 0.0504(-V)e^((0.0251)(T+460)-20.43)
CO Ef = 0.00488(-V)e^((0.0251)(T+460)-20.43)
On Site Yard CO emissions estimated by multiplying the TOC emissions by 0.32
*No emission factors available for PM10 or PM2.5, therefore IDEM assumes PM10 and PM2.5 are equivalent to Total PM.

Abbreviations
TOC = Total Organic Compounds
CO = Carbon Monoxide
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
HAP = Hazardous Air Pollutant
VOC = Volatile Organic Compound

Appendix A.1: Unlimited Emissions Calculations
Asphalt Load-Out, Silo Filling, and Yard Emissions (continued)

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

Organic Particulate-Based Compounds (Table 11.1-15)

					Speciation Profile		Unlimited/Uncontrolled Potential to Emit (tons/yr)			
Pollutant	**CASRN**	**Category**	**HAP Type**	**Source**	**Load-out and Onsite Yard (% by weight of Total Organic PM)**	**Silo Filling and Asphalt Storage Tank (% by weight of Total Organic PM)**	**Load-out**	**Silo Filling**	**Onsite Yard**	**Total**
PAH HAPs										
Acenaphthene	83-32-9	PM/HAP	POM	Organic PM	0.26%	0.47%	1.6E-03	2.1E-03	NA	3.6E-03
Acenaphthylene	208-96-8	PM/HAP	POM	Organic PM	0.028%	0.014%	1.7E-04	6.2E-05	NA	2.3E-04
Anthracene	120-12-7	PM/HAP	POM	Organic PM	0.07%	0.13%	4.2E-04	5.8E-04	NA	1.0E-03
Benzo(a)anthracene	56-55-3	PM/HAP	POM	Organic PM	0.019%	0.056%	1.1E-04	2.5E-04	NA	3.6E-04
Benzo(b)fluoranthene	205-99-2	PM/HAP	POM	Organic PM	0.0076%	0	4.5E-05	0	NA	4.5E-05
Benzo(k)fluoranthene	207-08-9	PM/HAP	POM	Organic PM	0.0022%	0	1.3E-05	0	NA	1.3E-05
Benzo(g,h,i)perylene	191-24-2	PM/HAP	POM	Organic PM	0.0019%	0	1.1E-05	0	NA	1.1E-05
Benzo(a)pyrene	50-32-8	PM/HAP	POM	Organic PM	0.0023%	0	1.4E-05	0	NA	1.4E-05
Benzo(e)pyrene	192-97-2	PM/HAP	POM	Organic PM	0.0078%	0.0095%	4.7E-05	4.2E-05	NA	8.9E-05
Chrysene	218-01-9	PM/HAP	POM	Organic PM	0.103%	0.21%	6.2E-04	9.3E-04	NA	1.5E-03
Dibenz(a,h)anthracene	53-70-3	PM/HAP	POM	Organic PM	0.00037%	0	2.2E-06	0	NA	2.2E-06
Fluoranthene	206-44-0	PM/HAP	POM	Organic PM	0.05%	0.15%	3.0E-04		NA	3.0E-04
Fluorene	86-73-7	PM/HAP	POM	Organic PM	0.77%	1.01%	4.6E-03	4.5E-03	NA	9.1E-03
Indeno(1,2,3-cd)pyrene	193-39-5	PM/HAP	POM	Organic PM	0.00047%	0	2.8E-06	0	NA	2.8E-06
2-Methylnaphthalene	91-57-6	PM/HAP	POM	Organic PM	2.38%	5.27%	1.4E-02	2.3E-02	NA	0.038
Naphthalene	91-20-3	PM/HAP	POM	Organic PM	1.25%	1.82%	7.5E-03	8.1E-03	NA	1.6E-02
Perylene	198-55-0	PM/HAP	POM	Organic PM	0.022%	0.03%	1.3E-04	1.3E-04	NA	2.6E-04
Phenanthrene	85-01-8	PM/HAP	POM	Organic PM	0.81%	1.80%	4.8E-03	8.0E-03	NA	1.3E-02
Pyrene	129-00-0	PM/HAP	POM	Organic PM	0.15%	0.44%	9.0E-04	2.0E-03	NA	2.9E-03
Total PAH HAPs							**0.035**	**0.050**	**NA**	**0.086**
Other semi-volatile HAPs										
Phenol		PM/HAP	---	Organic PM	1.18%	0	7.0E-03	0	0	7.0E-03

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

Methodology

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

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

Abbreviations

PM = Particulate Matter
HAP = Hazardous Air Pollutant
POM = Polycyclic Organic Matter

Appendix A.1: Unlimited Emissions Calculations
Asphalt Load-Out, Silo Filling, and Yard Emissions (continued)

Organic Volatile-Based Compounds (Table 11.1-16)

					Speciation Profile		Unlimited/Uncontrolled Potential to Emit (tons/yr)			
Pollutant	**CASRN**	**Category**	**HAP Type**	**Source**	**Load-out and Onsite Yard (% by weight of TOC)**	**Silo Filling and Asphalt Storage Tank (% by weight of TOC)**	**Load-out**	**Silo Filling**	**Onsite Yard**	**Total**
VOC		VOC	---	TOC	94%	100%	**6.85**	**21.35**	**1.81**	**30.01**
non-VOC/non-HAPS										
Methane	74-82-8	non-VOC/non-HAP	---	TOC	6.50%	0.26%	4.7E-01	5.6E-02	1.3E-01	0.654
Acetone	67-64-1	non-VOC/non-HAP	---	TOC	0.046%	0.055%	3.4E-03	1.2E-02	8.9E-04	0.016
Ethylene	74-85-1	non-VOC/non-HAP	---	TOC	0.71%	1.10%	5.2E-02	2.3E-01	1.4E-02	0.300
Total non-VOC/non-HAPS					7.30%	1.40%	**0.532**	**0.299**	**0.141**	**0.97**
Volatile organic HAPs										
Benzene	71-43-2	VOC/HAP	---	TOC	0.052%	0.032%	3.8E-03	6.8E-03	1.0E-03	1.2E-02
Bromomethane	74-83-9	VOC/HAP	---	TOC	0.0096%	0.0049%	7.0E-04	1.0E-03	1.9E-04	1.9E-03
2-Butanone	78-93-3	VOC/HAP	---	TOC	0.049%	0.039%	3.6E-03	8.3E-03	9.4E-04	1.3E-02
Carbon Disulfide	75-15-0	VOC/HAP	---	TOC	0.013%	0.016%	9.5E-04	3.4E-03	2.5E-04	4.6E-03
Chloroethane	75-00-3	VOC/HAP	---	TOC	0.00021%	0.004%	1.5E-05	8.5E-04	4.0E-06	8.7E-04
Chloromethane	74-87-3	VOC/HAP	---	TOC	0.015%	0.023%	1.1E-03	4.9E-03	2.9E-04	6.3E-03
Cumene	92-82-8	VOC/HAP	---	TOC	0.11%	0	8.0E-03	0	2.1E-03	1.0E-02
Ethylbenzene	100-41-4	VOC/HAP	---	TOC	0.28%	0.038%	2.0E-02	8.1E-03	5.4E-03	0.034
Formaldehyde	50-00-0	VOC/HAP	---	TOC	0.088%	0.69%	6.4E-03	1.5E-01	1.7E-03	0.155
n-Hexane	100-54-3	VOC/HAP	---	TOC	0.15%	0.10%	1.1E-02	2.1E-02	2.9E-03	0.035
Isooctane	540-84-1	VOC/HAP	---	TOC	0.0018%	0.00031%	1.3E-04	6.6E-05	3.5E-05	2.3E-04
Methylene Chloride	75-09-2	non-VOC/HAP	---	TOC	0	0.00027%	0	5.8E-05	0	5.8E-05
MTBE	1634-04-4	VOC/HAP	---	TOC	0	0	0	0	0	0
Styrene	100-42-5	VOC/HAP	---	TOC	0.0073%	0.0054%	5.3E-04	1.2E-03	1.4E-04	1.8E-03
Tetrachloroethene	127-18-4	non-VOC/HAP	---	TOC	0.0077%	0	5.6E-04	0	1.5E-04	7.1E-04
Toluene	100-88-3	VOC/HAP	---	TOC	0.21%	0.062%	1.5E-02	1.3E-02	4.0E-03	0.033
1,1,1-Trichloroethane	71-55-6	VOC/HAP	---	TOC	0	0	0	0	0	0
Trichloroethene	79-01-6	VOC/HAP	---	TOC	0	0	0	0	0	0
Trichlorofluoromethane	75-69-4	VOC/HAP	---	TOC	0.0013%	0	9.5E-05	0	2.5E-05	1.2E-04
m-/p-Xylene	1330-20-7	VOC/HAP	---	TOC	0.41%	0.20%	3.0E-02	4.3E-02	7.9E-03	0.080
o-Xylene	95-47-6	VOC/HAP	---	TOC	0.08%	0.057%	5.8E-03	1.2E-02	1.5E-03	2.0E-02
Total volatile organic HAPs					1.50%	1.30%	**0.109**	**0.278**	**0.029**	**0.416**

Methodology
Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Speciation Profile (%)] * [TOC (tons/yr)]
Specieation Profiles from AP-42 Chapter 11.1 (dated 3/04), Tables 11.1-15 and 11.1-16

Abbreviations
TOC = Total Organic Compounds
HAP = Hazardous Air Pollutant
VOC = Volatile Organic Compound
MTBE = Methyl tert butyl ether

Appendix A.1: Unlimited Emissions Calculations
Material Storage Piles

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

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.

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
where Ef = 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/PM2.5 (tons/yr)
Sand	2.6	3.01	0.80	0.439	0.154
Limestone	1.6	1.85	1.30	0.439	0.154
RAP	0.5	0.58	1.40	0.148	0.052
Gravel	1.6	1.85	1.20	0.406	0.142
Slag	3.8	4.40	1.00	0.803	0.281
			Totals	**2.23**	**0.78**

Methodology
PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
PTE of PM10/PM2.5 (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.
RAP - recycled asphalt pavement
Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PM2.5 = PM10
PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Material Processing, Handling, Crushing, Screening, and Conveying

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

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

To estimate potential fugitive dust emissions from processing and hangling 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)*[(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)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 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)
Ef (PM) =	2.27E-03	lb PM/ton of material handled
Ef (PM10) =	1.07E-03	lb PM10/ton of material handled
Ef (PM2.5) =	1.62E-04	lb PM2.5/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)	Unlimited/Uncontrolled PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	3.77	1.78	0.27
Front-end loader dumping of materials into feeder bins	3.77	1.78	0.27
Conveyor dropping material into dryer/mixer or batch tower	3.77	1.78	0.27
Total (tons/yr)	**11.32**	**5.35**	**0.81**

Methodology

The percent asphalt cement/binder provided by the source.
Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
Unlimited 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 additivies
*Worst case annual mean wind speed (Indianapolis, 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/PM2.5 (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
Unlimited Potential to Emit (tons/yr) =			**55.59**	**20.31**

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Asphalt Production Limitation (tons/yr)] * [1 - Percent Asphalt Cement/Binder (weight %)]
Unlimited 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).
**Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate matter (< 2.5 um)
PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Unpaved Roads

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

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 =	6,257,143	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	300	0.057	8443.6
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	17.0	0	17.0	1.5E+05	2.5E+06	300	0.057	8443.6
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	12.0	36.0	48.0	4.9E+03	2.3E+05	300	0.057	276.5
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	4.9E+03	5.8E+04	300	0.057	276.5
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.0	6.6E+02	2.9E+04	300	0.057	37.6
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.0	6.6E+02	7.9E+03	300	0.057	37.6
Aggregate/RAP Loader Full	Front-end loader (3 CY)	15.0	4.2	19.2	7.9E+05	1.5E+07	300	0.057	45032.5
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	15.0	0	15.0	7.9E+05	1.2E+07	300	0.057	45032.5
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	17.0	24.0	41.0	1.5E+05	6.0E+06	300	0.057	8295.5
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	17.0	0	17.0	1.5E+05	2.5E+06	300	0.057	8295.5
	Total				**2.2E+06**	**4.4E+07**			**1.2E+05**

Average Vehicle Weight Per Trip =	20.3	tons/trip
Average Miles Per Trip =	0.057	miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	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	0.9	= constant (AP-42 Table 13.2.2-2)
W =	20.3	20.3	20.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(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	PM2.5	
Unmitigated Emission Factor, Ef =	6.09	1.55	0.16	lb/mile
Mitigated Emission Factor, Eext =	4.01	1.02	0.10	lb/mile
Dust Control Efficiency =	50%	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)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	25.73	6.56	0.66	16.92	4.31	0.43	8.46	2.16	0.22
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	25.73	6.56	0.66	16.92	4.31	0.43	8.46	2.16	0.22
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	0.843	0.215	0.02	0.554	0.141	0.01	0.277	0.071	0.01
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	0.843	0.215	0.02	0.554	0.141	0.01	0.277	0.071	0.01
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	0.114	0.029	0.00	0.075	0.019	0.00	0.038	0.010	0.00
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	0.114	0.029	0.00	0.075	0.019	0.00	0.038	0.010	0.00
Aggregate/RAP Loader Full	Front-end loader (3 CY)	137.23	34.98	3.50	90.23	23.00	2.30	45.12	11.50	1.15
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	137.23	34.98	3.50	90.23	23.00	2.30	45.12	11.50	1.15
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	25.28	6.44	0.64	16.62	4.24	0.42	8.31	2.12	0.21
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	25.28	6.44	0.64	16.62	4.24	0.42	8.31	2.12	0.21
	Totals	**378.40**	**96.44**	**9.64**	**248.81**	**63.41**	**6.34**	**124.40**	**31.71**	**3.17**

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)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PM2.5 = PM10
PTE = Potential to Emit

Appendix A: Unlimited Emissions Calculations
Paved Roads

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (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 =	6,257,143	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 day (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	39.40	1.5E+05	5.9E+06	300	0.057	8443.6
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	17.0	0	17.00	1.5E+05	2.5E+06	300	0.057	8443.6
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	12.0	36.0	48.00	4.9E+03	2.3E+05	300	0.057	276.5
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.00	4.9E+03	5.8E+04	300	0.057	276.5
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.00	6.6E+02	2.9E+04	300	0.057	37.6
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.00	6.6E+02	7.9E+03	300	0.057	37.6
Aggregate/RAP Loader Full	Front-end loader (3 CY)	15.0	4.2	19.20	7.9E+05	1.5E+07	300	0.057	45032.5
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	15.0	0	15.00	7.9E+05	1.2E+07	300	0.057	45032.5
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	17.0	24.0	41.00	1.5E+05	6.0E+06	300	0.057	8295.5
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	17.0	0	17.00	1.5E+05	2.5E+06	300	0.057	8295.5
	Total				**2.2E+06**	**4.4E+07**			**1.2E+05**

Average Vehicle Weight Per Trip =	20.3	tons/trip
Average Miles Per Trip =	0.057	miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	20.3	20.3	20.3	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m^2 = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]

where p =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365	days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.15	0.03	0.01	lb/mile
Mitigated Emission Factor, Eext =	0.14	0.03	0.01	lb/mile
Dust Control Efficiency =	50%	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)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Aggregate/RAP Truck Enter Full	Dump truck (16 CY)	0.63	0.13	0.03	0.57	0.11	0.03	0.29	0.06	0.01
Aggregate/RAP Truck Leave Empty	Dump truck (16 CY)	0.63	0.13	0.03	0.57	0.11	0.03	0.29	0.06	0.01
Asphalt Cement/Binder Truck Enter Full	Tanker truck (6000 gal)	0.021	0.004	1.0E-03	0.019	0.004	9.2E-04	0.009	1.9E-03	4.6E-04
Asphalt Cement/Binder Truck Leave Empty	Tanker truck (6000 gal)	0.021	0.004	1.0E-03	0.019	0.004	9.2E-04	0.009	1.9E-03	4.6E-04
Fuel Oil Truck Enter Full	Tanker truck (6000 gal)	2.8E-03	5.6E-04	1.4E-04	2.6E-03	5.1E-04	1.3E-04	1.3E-03	2.6E-04	6.3E-05
Fuel Oil Truck Leave Empty	Tanker truck (6000 gal)	2.8E-03	5.6E-04	1.4E-04	2.6E-03	5.1E-04	1.3E-04	1.3E-03	2.6E-04	6.3E-05
Aggregate/RAP Loader Full	Front-end loader (3 CY)	3.35	0.67	0.16	3.06	0.61	0.15	1.53	0.31	0.08
Aggregate/RAP Loader Empty	Front-end loader (3 CY)	3.35	0.67	0.16	3.06	0.61	0.15	1.53	0.31	0.08
Asphalt Concrete Truck Leave Full	Dump truck (16 CY)	0.62	0.12	0.03	0.56	0.11	0.03	0.28	0.06	0.01
Asphalt Concrete Truck Enter Empty	Dump truck (16 CY)	0.62	0.12	0.03	0.56	0.11	0.03	0.28	0.06	0.01
	Totals	**9.23**	**1.85**	**0.45**	**8.44**	**1.69**	**0.41**	**4.22**	**0.84**	**0.21**

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)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PM2.5 = PM10
PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Cold Mix Asphalt Production and Stockpiles

Company Name: Rieth-Riley Construction Co., Inc.
Source Address: 1751 West Minnesota Street, Indianapolis, IN 46221
Permit Number: 097-30746-05319
Reviewer: Brian Williams

The following calculations determine the amount of VOC and HAP emissions created from volatilization of solvent used as diluent in the liquid binder for cold mix asphalt production

Maximum Annual Asphalt Production =	3,504,000	tons/yr
Percent Asphalt Cement/Binder (weight %) =	5.0%	
Maximum Asphalt Cement/Binder Throughput =	175,200	tons/yr

Volatile Organic Compounds

	Maximum weight % of VOC solvent in binder*	Weight % VOC solvent in binder that evaporates	Maximum VOC Solvent Usage (tons/yr)	PTE of VOC (tons/yr)
Cut back asphalt rapid cure (assuming gasoline or naphtha solvent)	25.3%	95.0%	44,325.6	42,109.3
Cut back asphalt medium cure (assuming kerosene solvent)	28.6%	70.0%	50,107.2	35,075.0
Cut back asphalt slow cure (assuming fuel oil solvent)	20.0%	25.0%	35,040.0	8,760.0
Emulsified asphalt with solvent (assuming water, emulsifying agent, and 15% fuel oil solvent)	15.0%	46.4%	26,280.0	12,193.9
Other asphalt with solvent binder	25.9%	2.5%	45,376.8	1,134.4
			Worst Case PTE of VOC =	**42,109.3**

Hazardous Air Pollutants

Worst Case Total HAP Content of VOC solvent (weight %)* =	26.08%	
Worst Case Single HAP Content of VOC solvent (weight %)* =	9.0%	Xylenes
PTE of Total HAPs (tons/yr) =	**10,983.67**	
PTE of Single HAP (tons/yr) =	**3,789.84**	**Xylenes**

Hazardous Air Pollutant (HAP) Content (% by weight) For Various Petroleum Solvents*

		Hazardous Air Pollutant (HAP) Content (% by weight)* For Various Petroleum Solvents				
Volatile Organic HAP	CAS#	Gasoline	Kerosene	Diesel (#2) Fuel Oil	No. 2 Fuel Oil	No. 6 Fuel Oil
1,3-Butadiene	106-99-0	3.70E-5%				
2,2,4-Trimethylpentane	540-84-1	2.40%				
Acenaphthene	83-32-9		4.70E-5%		1.80E-4%	
Acenaphthylene	208-96-8		4.50E-5%		6.00E-5%	
Anthracene	120-12-7		1.20E-6%	5.80E-5%	2.80E-5%	5.00E-5%
Benzene	71-43-2	1.90%		2.90E-4%		
Benzo(a)anthracene	56-55-3			9.60E-7%	4.50E-7%	5.50E-4%
Benzo(a)pyrene	50-32-8			2.20E-6%	2.10E-7%	4.40E-5%
Benzo(g,h,i)perylene	191-24-2			1.20E-7%	5.70E-8%	
Biphenyl	92-52-4			6.30E-4%	7.20E-5%	
Chrysene	218-01-9			4.50E-7%	1.40E-6%	6.90E-4%
Ethylbenzene	100-41-4	1.70%		0.07%	3.40E-4%	
Fluoranthene	206-44-0		7.10E-6%	5.90E-5%	1.40E-5%	2.40E-4%
Fluorene	86-73-7		4.20E-5%	8.60E-4%	1.90E-4%	
Indeno(1,2,3-cd)pyrene	193-39-5			1.60E-7%		1.00E-4%
Methyl-tert-butylether	1634-04-4	0.33%				
Naphthalene	91-20-3	0.25%	0.31%	0.26%	0.22%	4.20E-5%
n-Hexane	110-54-3	2.40%				
Phenanthrene	85-01-8		8.60E-6%	8.80E-4%	7.90E-4%	2.10E-4%
Pyrene	129-00-0		2.40E-6%	4.60E-5%	2.90E-5%	2.30E-5%
Toluene	108-88-3	8.10%		0.18%	6.20E-4%	
Total Xylenes	1330-20-7	9.00%		0.50%	0.23%	
Total Organic HAPs		**26.08%**	**0.33%**	**1.29%**	**0.68%**	**0.19%**
Worst Single HAP		**9.00% Xylenes**	**0.31% Naphthalene**	**0.50% Xylenes**	**0.23% Xylenes**	**0.07% Chrysene**

Methodology
Maximum Asphalt Cement/Binder Throughput = [Annual Asphalt Production Limitation (tons/yr)] * [Percent Asphalt Cement/Binder (weight %)]
Maximum VOC Solvent Usage (tons/yr) = [Maximum Asphalt Cement/Binder Throughput (tons/yr)] * [Maximum Weight % of VOC Solvent in Binder]
PTE of VOC (tons/yr) = [Weight % VOC solvent in binder that evaporates] * [Maximum VOC Solvent Usage (tons/yr)]
PTE of Total HAPs (tons/yr) = [Worst Case Total HAP Content of VOC solvent (weight %)] * [Worst Case Limited PTE of VOC (tons/yr)]
PTE of Single HAP (tons/yr) = [Worst Case Single HAP Content of VOC solvent (weight %)] * [Worst Case Limited PTE of VOC (tons/yr)]
*Source: Petroleum Liquids. Potter, T.L. and K.E. Simmons. 1998. Total Petroleum Hydrocarbon Criteria Working Group Series, Volume 2. Composition of Petroleum Mixtures. The Association for Environmental Health and Science. Available on the Internet at: http://www.aehs.com/publications/catalog/contents/tph.htm

Abbreviations
VOC = Volatile Organic Compounds
PTE = Potential to Emit

Appendix A.1: Unlimited Emissions Calculations
Gasoline Fuel Transfer and Dispensing Operation

Company Name: **Rieth-Riley Construction Co., Inc.**
Source Address: **1751 West Minnesota Street, Indianapolis, IN 46221**
Permit Number: **097-30746-05319**
Reviewer: **Brian Williams**

To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation handling emission factors from AP-42 Table 5.2-7 were used. The total potential emission of VOC is as follows:

Gasoline Throughput =	0	gallons/day
=	0.0	kgal/yr

Volatile Organic Compounds

Emission Source	Emission Factor (lb/kgal of throughput)	PTE of VOC (tons/yr)*
Filling storage tank (balanced submerged filling)	0.3	0.00
Tank breathing and emptying	1.0	0.00
Vehicle refueling (displaced losses - controlled)	1.1	0.00
Spillage	0.7	0.00
Total		**0.00**

Hazardous Air Pollutants

Worst Case Total HAP Content of VOC solvent (weight %)* =	26.08%	
Worst Case Single HAP Content of VOC solvent (weight %)* =	9.0%	Xylenes
Limited PTE of Total HAPs (tons/yr) =	**0.00**	
Limited PTE of Single HAP (tons/yr) =	**0.00**	**Xylenes**

Methodology
The gasoline throughput was provided by the source.
Gasoline Throughput (kgal/yr) = [Gasoline Throughput (lbs/day)] * [365 days/yr] * [kgal/1000 gal]
PTE of VOC (tons/yr) = [Gasoline Throughput (kgal/yr)] * [Emission Factor (lb/kgal)] * [ton/2000 lb]
PTE of Total HAPs (tons/yr) = [Worst Case Total HAP Content of VOC solvent (weight %)] * [PTE of VOC (tons/yr)]
PTE of Single HAP (tons/yr) = [Worst Case Single HAP Content of VOC solvent (weight %)] * [PTE of VOC (tons/yr)]
*Source: Petroleum Liquids. Potter, T.L. and K.E. Simmons. 1998. Total Petroleum Hydrocarbon Criteria Working Group Series, Volume 2. Composition of Petroleum Mixtures. The Association for Environmental Health and Science. Available on the Internet at: http://www.aehs.com/publications/catalog/contents/tph.htm

Abbreviations
VOC = Volatile Organic Compounds
PTE = Potential to Emit

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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
3		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
5		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 *(Local Official)*									
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