

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

**OFFICE OF AIR MANAGEMENT  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT  
DIVISION  
AIR QUALITY MANAGEMENT SECTION**

**Milestone Contractors, L.P.  
4202 S. Harding Street  
Indianapolis, Indiana 46206**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5501-00086	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date:

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Milestone Contractors, L.P.  
Indianapolis, Indiana  
Permit Reviewer: Brian Head

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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 Management (OAM) and Environmental Resources Management Division (ERMD), and presented in the permit application.

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

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The Permittee owns and operates a stationary hot drum-mix asphalt plant fired primarily on natural gas with coal (which when fired is done so simultaneously with natural gas) and #2 fuel oil as backup fuels. This plant has a maximum output of 500 tons of asphalt per hour.

Responsible Official: Ron Terrell  
Source Address: 4202 S. Harding Street, Indianapolis, IN 46206  
Mailing Address: P.O. Box 421459, Indianapolis, IN 46242-1459  
SIC Code: 2951  
County Location: Marion  
County Status: Nonattainment for TSP  
Source Status: Federally Enforceable State Operating Permit (FESOP) Program  
Minor Source under PSD and Emissions Offsets Rules

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

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

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

- (a) One (1) drum mix asphalt plant (Unit ID 2) with a maximum rated capacity of 500 tons per hour, equipped with one (1) 135 MM BTU/Hr burner (Unit ID 3): The primary fuel source is natural gas with virgin No. 2 distillate fuel oil and waste oil as a back up fuel. Particulate emissions are controlled by one (1) knock out box, and one (1) baghouse rated at 85,000 acfm, installed March 1993, and exhausting at stack 1.

### A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with a heat input equal to or less than 10 MMBTU/hr.
  - (1) One (1) Gentec hot oil heater, fired by natural gas and rated at 2200 MBTU/hr. The heater exhausts at stack/vent ID 5.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than 6 MMBTU/hr.
- (c) Fuel oil-fired combustion sources with heat input equal to or less than 2 MMBTU/hr and firing fuel containing less than 0.5 percent sulfur by weight.
- (d) Combustion source flame safety purging on startup.
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (i) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (j) Cleaners and solvents characterized as follows: (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or; (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) Closed loop heating and cooling systems.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (m) Paved and unpaved roads and parking lots with public access.
- (n) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (o) One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.
- (p) One (1) 24,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.
- (q) One (1) 10,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13-15] [IC 13-17]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

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

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

### **B.3 Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

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

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD .

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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

### **B.6 Severability [326 IAC 2-8-4(4)]**

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

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section

2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, ERMD, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:



Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

B.13 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to ERMD and IDEM, OAM, upon request and shall be subject

to review and approval by ERMD and IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

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

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division

Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to

prevent the situations identified in (g)(2)(B) of this condition.

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency.  
[326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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 ERMD and IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

- (b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until ERMD and IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit

modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Environmental Resources Management Division  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC

2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c) .

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches and the manufacture of stockpile mix, specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.24 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;



- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]

**B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]**

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Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

**B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to ERMD and IDEM, OAM,, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, from the entire source, including fugitive emissions to the extent quantifiable, shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset), and 326 IAC 2-2 (Prevention of Significant Deterioration).
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

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

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.3 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.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

C.5 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.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on 3/15/97. The plan consists of:

1. Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures:
  - A. Paved roads and parking lots:
    - a. Cleaning by vacuum sweeping on an as needed basis (monthly at a minimum).
    - b. Power brooming while wet either from rain or application of water.
  - B. Unpaved roads and parking lots:
    - a. Treating with emulsified asphalt on an as needed basis.
    - b. Treating with water on an as needed basis.
2. Fugitive particulate matter (dust) emissions from aggregate stockpiles shall be controlled by one or more of the following measures:
  - A. Maintain minimum size and number of stock piles of aggregate.
  - B. Treating around the stockpile area with emulsified asphalt on an as needed basis.
  - C. Treating around the stockpile area with water on an as needed basis.
3. Fugitive particulate matter (dust) emission from outdoor conveying of aggregates shall be controlled by the following measures.
  - A. Apply water at the feed and the intermediate points on an as needed basis.
4. Fugitive particulate matter (dust) emissions resulting from the transferring of aggregates shall be controlled by one or more of the following measures:
  - A. Minimize the vehicular distance between the transfer points.
  - B. Enclose the transfer points.
5. Fugitive particulate matter (dust) emissions resulting from transportation of aggregate by truck, front end loader, etc. shall be controlled by one or more of the following measures:
  - A. Tarping the aggregate hauling vehicles.
  - B. Maintain vehicle bodies in a condition to prevent leakage.
  - C. Spray the aggregates with water.
  - D. Maintain an 10 MPH speed limit in the yard.
6. Fugitive particulate matter (dust) emissions resulting from the loading and unloading of shall be controlled by one or more of the following measures:

- A. Reduce free fall distance to a minimum.
- B. Reduce the rate of discharge of the aggregate.

“An as needed basis” means the frequency or quantity of application necessary to minimize visible particulate matter emissions.

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

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- (a) All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

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

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

- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

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

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

**C.10 Performance Testing [326 IAC 3-2.1]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation with five (5) days prior to the end of the initial forty-five (45) day period.

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

### C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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 no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### C.12 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

C.15 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
  - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Asbestos  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

#### C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to ERMD and IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to ERMD and IDEM, OAM, that the Risk Management Plan is being properly implemented.

#### C.17 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by ERMD and IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to ERMD and IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. ERMD and IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to ERMD and IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. ERMD and IDEM, OAM reserve the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to ERMD that retesting in one-hundred and twenty (120) days is not practicable, ERMD may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

**C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit a certified, annual emission statement that must be received



by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Contain actual emissions of criteria pollutants from the source;
  - (2) Contain actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (c) The annual emission statement 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 ERMD and IDEM, OAM, on or before the date it is due.

#### C.20 Monitoring Data Availability

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered

a valid reason for failure to perform the requirements in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quality Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for

motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

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

#### **SECTION D.1 FACILITY OPERATION CONDITIONS**

One (1) drum mix asphalt plant (Unit ID 2) with a maximum rated capacity of 500 tons per hour, equipped with one (1) 135 MM BTU/Hr burner (Unit ID 3): The primary fuel source is natural gas with virgin No. 2 distillate fuel oil and waste oil as a back up fuel. Particulate emissions are controlled by one (1) knock out box, and one (1) baghouse rated at 85,000 acfm, installed March 1993, and exhausting at stack 1.

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

##### D.1.1 Nitrogen Oxides (NO<sub>x</sub>)-Emission Limitations [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4, the input usage of natural gas in the drum mixer burner shall be limited to 356.4 MMCF per 365 day period, rolled on a daily basis. For purposes of determining compliance for Nitrogen Oxide emissions, every 1000 gallons of waste oil burned shall be equivalent to 0.03795 MMCF of natural gas, and every 1000 gallons of virgin No. 2 distillate fuel oil shall be equivalent to 0.0364 MMCF of natural gas. This limit is equivalent to nitrogen oxide emissions of 98.0 tons per 365 day rolling period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calendar days shall not exceed .98 MMCF per day. Due to the above limit, the Prevention of Significant Deterioration (40 CFR 52.21) rules and the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

##### D.1.2 Sulfur Dioxide (SO<sub>2</sub>)-Emission Limitations [326 IAC 7-1.1-2, 2-8-4(1)]

Pursuant to 326 IAC 7-1.1-2, and 326 IAC 2-8-4(1) the sulfur dioxide emissions shall be limited as follows;

- a) The percent sulfur in waste oil/ residual oil burned shall not exceed 0.75 percent sulfur by weight. This limit satisfies the requirements of 326 IAC 7-1.1-2.
- b) When using No. 2 distillate fuel oil the SO<sub>2</sub> emissions from the 135 MMBTU burner shall be limited to .5 pounds per million BTU heat input, or a sulfur content of less than or equal to .5 percent. This limit satisfies the requirements of 326 IAC 7-1.1-2.
- c) Pursuant to 326 IAC 2-8-4(1), the input usage of waste/ residual oil in the drum mixer burner shall be limited to 1,774,300 gallons per 365 day rolling period, rolled on a daily basis. For purposes of determining compliance with the Sulfur Dioxide emissions, every 1000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 0.5992 gallons of waste oil, and every million cubic feet of natural gas shall be equivalent to 0.0051 gallons of waste oil. This limit is equivalent to sulfur dioxide emissions of 98.12 tons per 365 day period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of waste oil equivalents shall be limited such that the total gallons divided by the

accumulated calendar days shall not exceed 4861 gallons per day. Due to the above limit, the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.3 Particulate Matter (PM)-Emission Limitations [326 IAC 6-1-2]

That pursuant to 326 IAC 6-1-2 and 326 IAC 2-8-4, particulate matter (PM and PM-10) emissions from the asphalt plant shall not exceed 0.030 grains per dry standard cubic foot, or 15.4 pounds per hour. This limit satisfies the requirements of New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I), and the requirement of the part 70 operating permit regulation 326 IAC 2-7.

D.1.4 Volatile Organic Compound (VOC)-Emission Limitations [ 326 IAC 2-8-4(1)]

The VOC usage in the production of cold mix asphalt (stockpile mix) shall be limited to 21.7 tons per consecutive twelve month period rolled monthly. During the first year the amount of liquid binder shall be limited to 238.6 tons per/month. This is equivalent to 2864 tons of binder used per twelve month period in the production of cold mix (stockpile mix) based on 1.0% diluent present in the asphalt. This production limit has been instituted in order to insure that the total emission from this source for VOC remain below twenty-five (25) tons per year such that 326 IAC 8-1-6 does not apply. Due to the above limits, the Prevention of Significant Deterioration (326 IAC 2-2 and 40 CFR 52.21) and the Part 70 rules do not apply.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

D.1.6 Used Oil Requirements

The waste oil burned in the dryer/burner shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

**Compliance Determination Requirements**

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight for distillate, and 0.75% for waste oil by:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the

procedures in 40 CFR 60, Appendix A, Method 19.

- (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

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

#### D.1.8 Testing Requirements

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

### **Compliance Monitoring Requirements**

#### D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the dryer/burner, at least once daily when the asphalt plant is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

#### D.1.10 Visible Emissions Notations

- (a) Daily visible emission notations of the dryer/burner stack exhaust 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken daily and shall be complete and sufficient to establish compliance with the natural gas usage limits and/or the emission limits established in Condition D.1.1.
  - (1) the quantity of natural gas and its equivalent combusted
- (b) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) thru (5) below. Records maintained for (1) thru (5) shall be complete and sufficient to establish compliance with the fuel oil usage limits and/ the limits of the sulfur content of the fuel oil.
  - (1) Calendar dates covered in the compliance determination period; and
  - (2) Daily distillate and waste oil useage;and
  - (3) A 365 day rolling sum of waste oil and its distillate oil equivalents
  - (4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
  - (5) sulfur content of the oils combusted with associated Fuel supplier certifications.

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

- (i) The name of the fuel supplier; and
- (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

- (c) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the following values;
  - (1) the amount of liquid binder used in the production of cold (stock pile) mix; and
  - (2) the average diluent content of the liquid binder; and
  - (3) the amount of cold mix (stockpile mix) produced.

- (d) To document compliance with Condition D.1.9, the Permittee shall maintain the following:
  - (1) Daily records of the inlet and outlet differential static pressure; and
  - (2) Documentation of all response steps implemented, per event .
  - (3) All instruments and equipment shall be calibrated, maintained, and operated according to manufacturers specifications.
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (e) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the dryer/burner stack exhaust.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.1, D.1.2, and D.1.4 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Insignificant Emitting Activities

- (1) One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.
- (2) One (1) 24,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

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

#### D.2.1 Operational Parameters

Storage tanks shall comply with the New Source Performance Standards (NSPS), 326 IAC 12 (40 CFR Part 60.116b only, Subpart Kb). 40 CFR Part 60.116b requires the permittee to maintain accessible records showing the dimension of each storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks. In addition, the owner or operator shall notify the Administrator when the maximum true vapor pressure of any VOL stored in these vessels exceeds 27.6 kPa or 4.00 psia.

**ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION  
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
CERTIFICATION**

Source Name: Milestone Contractors, L.P.  
Source Address: 4202 S. Harding St., Indianapolis, IN 46206  
Part 70 Permit No.: F097-5501-00086

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.  
Indianapolis Indiana 46221  
Phone: 317-327-2234  
Fax: 317-327-2274

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

Source Name: Milestone Contractors  
Source Address: 4200 S. Harding St.  
Part 70 Permit No.: F097-5501-00086

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (10) calendar days

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

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

Describe the cause of the Emergency/Deviation:

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

2

Page 2 of

Date/Time Emergency/Deviation started:

Date/Time Emergency/Deviation was corrected:

Was the facility being properly operated at the time of the emergency/deviation?    Y    N  
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>x</sub>, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency/deviation:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
 AIR QUALITY MANAGEMENT SECTION  
 DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
 QUARTERLY COMPLIANCE REPORT**

Source Name: Milestone Contractors, L.P.  
 Source Address: 4202 S. Harding St., Indianapolis, IN 46206  
 Part 70 Permit No.: F097-5501-00086

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE**

**FESOP Quarterly Report**

Source Name: Milestone Contractors  
Source Address: 4200 S. Harding St.  
FESOP No.: F097-5501-00086  
Facility: Dryer/Burner  
Parameter: Percent sulfur by weight for all fuel oil  
Limit: Sulfur content of the No. 2 distillate fuel oil not to exceed 0.50% ; Sulfur content of the waste oil not to exceed 0.75%

**Quarter: \_\_\_\_\_ Year: \_\_\_\_\_**

Dates fuel oil combusted	Type of fuel oil combusted (distillate #2, or waste oil )	Percent sulfur by weight of fuel oil combusted

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION  
 and  
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FESOP Monthly Report**

Source Name: Milestone Contractors  
 Source Address: 4200 S. Harding St.  
 FESOP No.: F097-5501-00086  
 Facility: Dryer/ Burner  
 Limit: The dryer / burner shall be limited to 1,774,300 gallons of waste oil and waste oil equivalent during the last 365 day period. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 0.0051 gallons of waste oil, based on SO2 emissions. Every 1,000 gallons of No. 2 distillate fuel oil burned with a maximum sulfur content of 0.50% shall be equivalent to 0.5992 gallons of waste oil based on SO2 emissions. During the first 365 days of operation under this permit, the input of waste oil and waste oil equivalents shall be limited such that the total gallons divided by the accumulated calendar days shall not exceed 4,861 gallons per day.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	waste oil and its equivalent (gal/day)	waste oil and its equivalents (gal/365 day)	Day	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	waste oil and its equivalent (gal/day)	waste oil and its equivalents (gal/365 day)	
1					17					
2					18					
3					19					
4					20					
5					21					
6					22					
7					23					
8					24					
9					25					
10					26					
11					27					
12					28					
13					29					
14					30					
15					31					
16					no. of deviations					

9 No deviation occurred in this month.  
 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_  
 Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, OFFICE OF AIR MANAGEMENT, COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION, AIR QUALITY MANAGEMENT SECTION  
FESOP Monthly Report**

Source Name: Milestone Contractors      Source Address: 4200 S. Harding St. , Indianapolis, IN. 46206  
FESOP No.: F097-5501-00086      Facility: 135 MMBTU/Hr burner  
Parameter: oxides of nitrogen      Limit: 356.4 MMCF of natural gas and natural gas equivalents during the last 365 day period. For purposes of determining compliance, every 1000 gallons of No. 2 distillate fuel burned shall be equivalent to 0.0364 MMCF of natural gas based on NOx emissions, and every 1000 gallons of waste oil burned shall be equivalent to 0.0291 MMCF of natural gas based on NOx emissions. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calendar days shall not exceed 0.979 MMCF per day.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Natural Gas usage (MMCF/day)	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	Natural Gas usage and its equiv. (MMCF/day)	Natural Gas usage and its equiv. (MMCF/365 day)	Day	Natural Gas usage (MMCF/day)	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	Natural Gas usage and its equiv. (MMCF/day)	Natural Gas usage and its equiv. (MMCF/365 day)
1						17					
2						18					
3						19					
4						20					
5						21					
6						22					
7						23					
8						24					
9						25					
10						26					
11						27					
12						28					
13						29					
14						30					
15						31					
16						no. of deviations					

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.      Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Milestone Contractors, L.P.  
Indianapolis, Indiana  
Permit Reviewer: Brian Head

Page 42 of 39  
FESOP No. F097-5501-00086

Signature: \_\_\_\_\_  
Phone: \_\_\_\_\_

Date: \_\_\_\_\_

## **Environmental Resources Management Divisions Air Quality Management Section**

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

#### **Source Background And Description**

<b>Source Name:</b>	<b>Milestone Contractors, L.P.</b>
<b>Source Location:</b>	<b>4202 S. Harding St., Indianapolis, IN 46206</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2951</b>
<b>Operation Permit No.:</b>	<b>F097-5501-00086</b>
<b>Permit Reviewer:</b>	<b>Brian Head</b>

The Environmental Resource Management Division (ERMD), Air Quality Management Section has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Milestone Contractors, L.P., relating to the operation of Drum Mix Asphalt Plant.

#### **Permitted Emission Units and Pollution Control Equipment**

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

One (1) drum mix asphalt plant (Unit ID 2) with a maximum rated capacity of 500 tons per hour, equipped with one (1) 135 MM BTU/Hr burner (Unit ID 3): The primary fuel source is natural gas with virgin No. 2 distillate fuel oil and waste oil as a back up fuel. Particulate emissions are controlled by one (1) knock out box, and one (1) baghouse rated at 85,000 acfm, installed March 1993, and exhausting at stack 1.

#### **Unpermitted Emission Units and Pollution Control Equipment**

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

#### **Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

There are no new facilities to be reviewed under the ENSR process.

#### **Insignificant Activities**

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu/hr.
  - (a) One (1) Gentec hot oil heater, fired by natural gas and rated at 2200 MBTU/hr. The heater exhausts at stack/vent ID 5.
- (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu/hr.
- (3) Fuel oil-fired combustion sources with heat input equal to or less than two million

- (2,000,000) Btu/hr and firing fuel containing less than five-tenths (0.5) percent.
- (4) Combustion source flame safety purging on startup.
  - (5) A gasoline fuel transfer and dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day, such as filling of tanks, locomotives, automobiles, having storage capacity less than or equal to ten thousand five hundred (10,500) gallons.
  - (6) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing less than or equal to two hundred thousand (230,000) gallons per month.
  - (7) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
  - (8) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
  - (9) Cleaners and solvents characterized as follows:
    - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
    - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C(68°F); the use of which for all cleaners and solvents combined does not exceed one hundred forty-five (145) gallons per twelve (12) months.
  - (10) Closed loop heating and cooling systems.
  - (11) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - (12) Paved and unpaved roads and parking lots with public access.
  - (13) A laboratory as defined in 326 IAC 2-7-1(20)(C).
  - (14) One (1) 30,000 gallon VOL Storage Tanks, maximum true vapor pressure less than 15.0 kPa.
  - (15) One (1) 24,000 gallon VOL Storage Tank, maximum true vapor pressure less than 15.0 kPa.
  - (16) One (1) 10,000 gallon VOL Storage Tank, maximum true vapor pressure less than 15.0 kPa.

### Existing Approvals

This source has been operating under the following approvals:

- (1) Construction Permit issued 02/01/95)

### Enforcement Issue

There are no Enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on 3/15/96. Additional information was received on 10/12/97.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	41,964.2
PM-10	9,913.1
SO <sub>2</sub>	946.1
VOC	>25.0
CO	4.2
NO <sub>x</sub>	325.3

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations

HAP	Potential Emissions (tons/year)
Benzene	2.6
Formaldehyde	7.9
Methyl Chloroform	1.1
Naphthalene	1.1
all others	2.3
TOTAL	15.0

See attached spreadsheets for detailed calculations

(a) The potential emissions (as defined in the Indiana Rule) of PM10, SO<sub>2</sub>, and NO<sub>x</sub>, are

equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit of 99 tons per year, for NO<sub>x</sub> and SO<sub>2</sub>, including insignificant emitting activities.
- (b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs, including insignificant emitting activities.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Limited Potential to Emit (tons/year)							
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
mixer / dryer	54.12	45.24	98.1	.25	13.98	97.9	6.62
process equip.	21.89	21.89	neg.	21.7	neg.	neg.	neg.
total fugitive	9.82	4.6	neg.	neg.	neg.	neg.	neg.
Insignificant Activities	neg.	neg.	neg.	.05	.16	.1	neg.
Total Emissions	85.83	71.73	98.23	22.0	14.16	98.81	8.19

Attached Tables summarize the permit conditions and requirements.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	nonattainment
PM-10	unclassifiable
SO <sub>2</sub>	attainment

NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) Since this hot mix asphalt plant commenced construction after June 11, 1973, this plant is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.90, Subpart I). This rule limits discharges of particulate matter to .04 gr/dscf, and has an opacity limit of 20 percent. Milestone Contractors L.P., conducted stack test on June 14, 1996 confirming compliance with the .04 gr/dscf discharge standard.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC, and NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-1-2(a) (Particulate Limitations)

This rule requires that particulate matter emissions from asphalt plants not exceed 0.03 grains per dry standard cubic foot (gr/dscf). In order to comply with this limitation, the baghouse shall be in operation at all times the asphalt concrete plant is in operation. Based on stack test performed on the source appears to be in compliance with the above limitation. This limit is

equivalent to a potential to emit of 20.3 tons PM<sub>10</sub> and PM per 12 month period for the asphalt concrete facility.

326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

This rule requires a fugitive dust control plan for all sources with potential fugitive PM emissions in excess of 25 tons, and located in nonattainment areas. Milestone Contractors, L.P., submitted a fugitive dust control plan on June 12, 1996. This plan was reviewed, and approved by ERMD. The source shall comply with all dust abatement measures contained therein. The fugitive dust control plan has been included as Attachment 2.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Since the potential to emit of SO<sub>2</sub> exceeds 25 tons per year, sulfur dioxide emissions from the combustion of distillate oil shall be limited to 0.5 pounds per million BTU heat input (the equivalent of 0.5% sulfur content), and the combustion of residual fuel oil shall be limited to 1.6 pounds per million BTU heat input (the equivalent of 1.52% sulfur content, however the company has accepted a sulfur content limit of 0.75 %).

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

This rule applies to paving application operations. The source is an asphalt production plant, not a paving operation, therefore, 326 IAC 8-5-2 is not applicable.

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

This rule applies to facilities constructed as of January 1, 1980, which have the potential to emit VOCs' at a rate greater than 25 tons per year. By restricting the amount of cutback asphalt produced, the source has restricted its potential VOC emissions to less than 25 tons per year, therefore this rule does not apply.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs ERMD, and IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The baghouse has applicable compliance monitoring conditions as specified below:



- (a) Daily visible emissions notations of the baghouse exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the baghouse controlling the shot blasting system, at least once daily when the shot blasting system is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 8.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 5-1 (Visible Emissions Limitations), 326 IAC 6-1-2 (Particulate Limitations), and 326 IAC 2-8 (FESOP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations

### **Conclusion**

The operation of this hot mix asphalt plant will be subject to the conditions of the attached proposed **FESOP No. F097-5501-00086**.

Table (1)

<b>Stack/Vent ID:</b> 1				
<b>Stack/Vent Dimensions:</b> Ht: 40ft                      Dia: 5 ft                      Temp: 265°F                      Flow: 85000 acfm				
<b>Emission Unit:</b> Drum Mix Plant				
<b>Pollution Control Equipment:</b> PM - Baghouse				
<b>EMISSIONS LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	0.03 gr/dscf	20% opacity	24 tons/year	0.5 lbs/MMBtu fuel oil sulfur
<b>Regulation/Citation:</b>	326 IAC 6-1-2	NSPS Subpart I	326 IAC 8-1-6	326 IAC 7-1.1-2
<b>Compliance Demonstration:</b>	---	---	---	---
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>	PM	Opacity	---	---
<b>Testing Method/Analysis:</b>	EPA Method 5	Visual inspection	---	---
<b>Testing Frequency/Schedule:</b>	Every 5 years	Once	---	---
<b>Submittal of Test Results:</b>	Within 45 days of testing	---	---	---
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	Control device parameters	Opacity observations	---	Recordkeeping
<b>Monitoring Method:</b>	Record pressure drop	Opacity observations	---	Records, vendor certification
<b>Monitoring Regulation/Citation:</b>	---	326 IAC 12	---	326 IAC 7-2-1
<b>Monitoring Frequency:</b>	Daily	Daily	---	Monthly
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Total static pressure drop across baghouse	Opacity	Fuel usage records	Sulfur content, heat content, fuel consumption, emission rate
<b>Recording Frequency:</b>	Daily	Daily	Monthly	Monthly
<b>Report Submittal Schedule:</b>	When requested by OAM	When requested by OAM	Quarterly	When requested by OAM
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	---	---	Fuel usage	Certification, sulfur content, heat content, fuel consumption, emission rate
<b>Reporting Frequency:</b>	---	---	Quarterly	Quarterly

Milestone Contractors, L.P.  
Indianapolis, Indiana  
Permit Reviewer: Brian Head

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Unlimited and Limited Potential to Emit from Combustion

UNLIMITED POTENTIAL TO EMIT																		
Source	Fuel Source	Consumption Units	SCC ID Code	mmbtu/hr Rating	Annual Hrs Operation	Annual Fuel Consumption	PM10		PM		SO2		NOx		VOC		CO	
							(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)
Aggreg. Dryer	Nat gas	MMCF	10200601	135.0	8760.0	1182.6	0.41	1.77	0.41	1.77	0.08	0.35	74.25	325.22	0.19	0.83	5.40	23.65
Aggreg. Dryer	No. 2 oil	1000 gal		135.0	8760.0	8447.1	0.96	4.22	1.93	8.45	67.50	295.65	19.29	84.47	0.19	0.84	4.82	21.12
Aggreg. Dryer	No. 4 waste	1000 gal	10500113	135.0	8760.0	8447.1	49.18	215.40	58.82	257.64	67.50	295.65	15.43	67.58	0.10	0.42	2.03	8.87
Hot oil heater	Nat gas	MMCF	10200601	2.00	8760.0	17.5	0.01	0.03	0.01	0.03	0.00	0.01	0.20	0.88	0.01	0.05	0.04	0.18

NOTE: Assume that the heating value of natural gas is 1000 Btu / Cubic Foot, distillate oil is 0.14 MMBtu / Gallon, residual oil is 0.15 MMBtu / Gallon, LPG is 0.094 MMBtu / Gallon.

UNITS	LPG	
	10201001	10201002
	Butane	Propane
PM	0.6	0.6
PM-10	0.28	0.26
SO2	0.09	0.1
NOx	21	19
VOC	0.26	0.25
CO	3.6	3.2

UNITS	Residual Oil		
	Rated Capacity, MMBtu/hr		
	No. 5	No. 6, 10-100	No. 6, >100
PM	10	3.22	3.22
PM-10	8.6	2.7692	2.7692
SO2	158	157	158
NOx	55	55	55
VOC	0.28	0.28	0.28
CO	5	5	5

UNITS	Distillate Oil		
	Rated Capacity, MMBtu/hr		
	No. 1 & 2	No. 4	Waste # 4*
PM	2	7	61
PM-10	1	6.02	51
SO2	Refer to note below.		
NOx	20	20	16
VOC	0.2	0.2	0.1
CO	5	5	2.1

UNITS	Natural Gas Emission Factors		
	Rated Capacity, MMBtu/hr		
	< 10 *	10-100	> 100
PM	3	6.2	3
PM-10	3	3	3
SO2	0.6	0.6	0.6
NOx	100	140	550
VOC	5.3	2.8	1.4
CO	20	35	40

Wt% Sulfur: NA 0 0

Wt% Sulfur= \* AP-42 1.11-4 Wt% Ash = 1 Wt% Sulfur= 0.486

\* 1-05-001-06 Natural gas space heater

SAMPLE CALCULATION	MMCF	X	LB	X	TONS	=	TONS
	YR		MMCF		LB		YR

Note: Potential to Emit SO2 is greater than 25 tpy or 10 lb/hr. Therefore, facility is limited to 0.5 lb SO2 / MMBtu for distillate oil combustion (No. 2 oil, No. 4 oil, and No. 4 waste oil).

LIMITED POTENTIAL TO EMIT									
Source	Fuel Source	Consumption Units	Limited Fuel Consumption	PM-10(1)	PM(1)	SO2(2)	NOx(3)	VOC	CO
				(Ton/Yr)	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)
Aggreg. Dryer	Nat gas	MMCF	356.4	88.71	88.71		98	0.25	7.13
Aggreg. Dryer	No. 4 waste	1000 gal	1670.9			99.00			

- (1) Limited PTE for PM and PM-10 are based on 0.03 gr/dscf at 78,767 acfm  
 $(0.03 \text{ gr/acfm} \times 78767 \text{ acfm} \times 60 \text{ min/hr}) / (7,000 \text{ gr/acfm}) = 20.25 \text{ lbs/hr}$   
 $20.25 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times \text{ton}/2000 \text{ lbs} = 88.71 \text{ tons/yr}$
- (2) For SO2 the limiting fuel is waste oil. The throughput of waste oil is limited to 1681.5 thousand gallons per 365 day rolling sum  
 This fuel usage limit is equivalent to 98 tons of SO2 and has been calculated as follows:  
 $(99 \text{ ton}/365 \text{ day} \times 2000 \text{ lbs/ton}) / (158 \text{ (0.75) lbs/Mgal}) = 1670.89 \text{ Mgal}$   
 The Distillate Oil equivalents was calculated as follows:
- (3) For NOx the limiting fuel is Natural Gas. The throughput of Natural Gas is limited to 356.36 million cubic feet per 365 day rolling sum.  
 This fuel usage limit is equivalent to 98 ton of NOx and has been calculated as follows:  
 $(99 \text{ tons}/365 \text{ days} - 1 \text{ ton insignificant}) \times 2000 \text{ lbs/ton} / (550 \text{ lbs/MMCF}) = 356.36 \text{ MMCF}/365 \text{ days}$

Limited hours of operation =  $\text{kGal oil} \times 1000 \times (0.14 \text{ MMBtu/Gal}) / (\text{MMBtu/hr}) = (\text{Limited fuel consumption}) \times (\text{MMBtu/Unit}) / (\text{MMBtu/hr})$

% sulfur in distillate oil =  $(0.5 \text{ lb SO2/MMBtu}) \times (1 \text{ lb S}/2 \text{ lb SO2}) \times (0.14 \text{ MMBtu/gal}) \times (1 \text{ gal}/7.2 \text{ lbs}) \times 0.486\%$

Equivalence	$142.5/158(.75) =$	0.5992
	$0.6/158(.75) =$	0.0051

# Indianapolis Environmental Resource Management Division(ERMD) Air Quality Management Section

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

## Source Background And Description

<b>Source Name:</b>	<b>Milestone Contractors, L.P.</b>
<b>Source Location:</b>	<b>4202 S. Harding St., Indianapolis, IN 46206</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2951</b>
<b>Operation Permit No.:</b>	<b>F0097-5501-00086</b>
<b>Permit Reviewer:</b>	<b>Brian Head</b>

On November 9, 1996, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Milestone Contractors, L.P., had applied for a Federally Enforceable State Operating Permit (FESOP) to operate its hot mix asphalt plant. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the ERMD and IDEM have decided to make the following changes to the FESOP:

1. Section A, B and C of this FESOP has been updated to include numerous revisions to the rule cites and minor modification to the wording of several conditions to be consistent with state rules. Due to the nature of these minor changes the identification of each of the individual changes will not be identified in this document.
2. The following **new conditions** have been **added** to Section C to reflect state and federal rule;
  - a) Condition C.1 - Overall Source Limit
  - b) Condition C.8 - Asbestos Abatement Projects -Accreditation
  - c) Condition C.14 - Asbestos Abatement Projects
  - d) Condition C.15 - Risk Management Plans
  - e) Condition C.22 - Stratospheric Ozone Protection
3. Former Condition C.12 Compliance Monitoring Plan - Failure to take Corrective Action was deleted.
4. Major **revisions to existing conditions** in Section D of this FESOP has been made to provide clarity and reflect state rules.
  - a) Condition D.1.1 Nitrogen Oxides Emission Limitations
  - b) Condition D.1.2 Sulfur Dioxide Emission Limitations
  - c) Condition D.1.10 Visible Emissions Notations
  - d) Condition D.1.11 Record Keeping Requirements

5. The following **new conditions** have been **added** to Section D to reflect state and federal rule;
  - a) Condition D.1.6 Used Oil Requirements
  - b) Condition D.1.7 Sulfur Dioxide Emissions and Sulfur Content
  
6. In addition to the above changes all of the reporting forms at the end of the permit have changed (pages 33-38).

Please be advised that many conditions with-in the permit have changed. The addendum supplied with this permit can be used to reference major changes, however, ERMD highly suggest that Milestone Contractors L.P. review the complete permit.