

Mr. Rick Flint  
J.H. Rudolph and Co., Inc.  
P.O. Box 5226  
Evansville, Indiana 47716-5226

Re: SMF 037-9530  
Second Significant Modification to  
FESOP F037-5590-05022

Dear Mr. Flint:

J.H. Rudolph and Co., Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on December 9, 1996, a Significant Modification to the FESOP on June 4, 1997 and an Administrative Amendment on June 20, 1997 for a stationary asphalt drum-mix plant. A letter requesting a significant modification was received on March 2, 1998. Pursuant to the provisions of 326 IAC 2-8-11(d) the permit is hereby approved as described in the attached Technical Support Document.

The modification consists of increasing the allowable PM-10 emissions from the one (1) natural gas fired drum mixer/dryer from 8.2 pounds per hour to 19.2 pounds per hour. The source is also fulfilling the requirements of 326 IAC 2-1-3.2 (State construction and operating permits: enhanced new source review).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act -IC 4-21.5-3-5. If you have any questions on this matter, please contact Cathie Moore, of my staff, at 317-233-2637 or 1-800-451-6027 (ext 3-2637).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

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cc: File - Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Air Compliance Section - Ray Schick  
Compliance Data Section - Jerri Curless  
Administration and Development Section - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW (ENSR)  
OFFICE OF AIR MANAGEMENT**

**J.H. Rudolph and Co., Inc.  
(ISHC No. 3332)  
5454 South 50 East  
Huntingburg, Indiana 47542**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F037-5590-05022	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 9, 1996
First Significant Permit Modification: SMF037-8379-05022	Pages Affected: 4, 22 - 24.b, 27.a - 27.b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 4, 1997
First Administrative Amendment: AAF037-8059-05022	Pages Affected: 23
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 20, 1997
Second Significant Permit Modification: SMF037-9530-05022	Pages Affected: 1a, 22
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION D

## FACILITY OPERATION CONDITIONS

- (1) one (1) Standard Havens drum mixer/dryer (ID# 24), with a maximum capacity of 470 tons per hour. This facility is attached to a baghouse (ID# 16) and exhausts through stack SV1.
- (2) one (1) Genco AF-100 natural gas-fired drum mixer/dryer burner (ID# 26), with a maximum heat input rate of 99.8 million Btu per hour. This facility uses butane as a back-up fuel, is attached to a baghouse (ID# 16), and exhausts through stack SV1.

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

#### D.1 Particulate Matter less than 10 microns (PM-10)

The PM-10 emissions from the drum mixer/dryer and burner shall be limited to 19.2 pounds per hour based on 8,760 hours per year by operating a baghouse according to the compliance monitoring plan. Therefore, the Part 70 (326 IAC 2-7) rules do not apply. Compliance with this condition shall also ensure compliance with the grain loading limit under operation condition D.2.

#### D.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Process Operations), particulate matter emissions from the drum mixer/dryer shall not exceed 68.2 pounds per hour.

#### D.3 Particulate Matter (PM)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I), particulate matter emissions from the drum mixer/dryer and burner shall not exceed 0.04 grains per dry standard cubic foot, and visible emissions shall not exceed 20 percent opacity. Compliance with the grain loading limit shall satisfy the requirements of 326 IAC 6-3 (Condition D.2).

#### D.4 Cold-Mix Cutback Asphalt Concrete Usage

The VOC emissions from the production of cold mix cutback asphalt shall be limited to 77.46 tons per twelve (12) consecutive month period, rolled on a monthly basis. This is equivalent to 807.8 tons of liquid asphalt binder used per twelve (12) consecutive month period in the production of cold mix cutback asphalt, based on fifteen percent (15.0%) diluent present in the liquid asphalt binder. Therefore, the requirements of 326 IAC 2-7 will not apply.

#### D.4.1 Fuel Usage Limits

Emissions of Sulfur dioxide (SO<sub>2</sub>) and oxides of nitrogen (NO<sub>x</sub>) from the dryer burner are limited to ninety-nine (99) tons per twelve (12) consecutive month period.

- (a) The Permittee is allowed to burn a maximum of 874.2 million cubic feet of natural gas and 8,975,852 gallons of butane in any combination in the 99.8 MMBtu per hour dryer burner per twelve (12) consecutive month period.
- (b) Number 2 fuel oil is limited to 2,828,329.0 gallons per twelve (12) consecutive month period, rolled on a monthly basis, or the equivalent amount of waste oil (1 gallons of waste oil = 3.42 gallons of #2 fuel oil).

#### D.4.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations), sulfur dioxide emission from the 99.8 million Btu per hour dryer shall be limited as follows:

## Indiana Department of Environmental Management Office of Air Management

Addendum to the  
Technical Support Document for the Significant Modification to the  
Federally Enforceable State Operating Permit (FESOP)  
and Enhanced New Source Review (ENSR)

<b>Source Name:</b>	J.H. Rudolph and Company, Inc.
<b>Source Location:</b>	5454 South 50 East, Huntingburg, Indiana 47542
<b>County:</b>	Dubois
<b>SIC Code:</b>	2951
<b>Significant Modification No.:</b>	SMF037-9530-05022
<b>Operation Permit No.:</b>	F037-9530-05022
<b>Permit Reviewer:</b>	Cathie Moore

On March 25, 1998, the Office of Air Management (OAM) had a notice published in the Herald, Jasper, Indiana, stating that J.H. Rudolph and Company, Inc. had applied for a Significant Modification to the Federally Enforceable State Operating Permit (FESOP) to operate a stationary asphalt drum-mix plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final Significant Modification to the FESOP permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. Condition D.3 "Particulate Matter" has been changed to be as follows:

D.3 Particulate Matter (PM)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I), particulate matter emissions from the drum mixer/dryer and burner shall not exceed ~~0.40~~ **0.04** grains per dry standard cubic foot, and visible emissions shall not exceed 20 percent opacity. Compliance with the grain loading limit shall satisfy the requirements of 326 IAC 6-3 (Condition D.2).

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

Technical Support Document for the Significant Modification to the  
Federally Enforceable State Operating Permit (FESOP)  
and Enhanced New Source Review (ENSR)

<b>Source Name:</b>	J.H. Rudolph and Co., Inc.
<b>Source Location:</b>	5454 South 50 East, Huntingburg, Indiana 47542
<b>County:</b>	Dubois
<b>SIC Code:</b>	2951
<b>Significant Modification No.:</b>	SMF037-9530-05022
<b>Operation Permit No.:</b>	F037-5590-05022
<b>Permit Reviewer:</b>	Cathie Moore

The Federally Enforceable State Operating Permit (FESOP) was issued on December 9, 1996. The First Significant Modification was issued on June 4, 1997. The First Administrative Amendment was issued on June 20, 1997. On March 2, 1998, J.H. Rudolph and Co., Inc. filed an Amendment requesting certain changes to the permit. This proposed Significant Modification to the Federally Enforceable State Operating Permit (FESOP) does not contain any new proposed emission units. The following changes were agreed to and made as the Second Significant Modification for this source:

- (1) Condition D.1 has been changed to be as follows to increase the allowable PM-10 emissions from the entire source from fifty-one (51) tons per year to be ninety-nine (99) tons per year, rolled on a monthly basis. This condition is being changed because the original PM-10 limit was calculated incorrectly. There are no changes in reporting forms due to this revision (strikeout added to show what was deleted and bold added to show what was added):

D.1 Particulate Matter less than 10 microns (PM-10)  
~~That~~ The PM-10 emissions from the drum mixer/dryer and burner shall be limited to ~~8.2~~ **19.2** pounds per hour based on 8,760 hours per year by operating a baghouse according to the compliance monitoring plan. Therefore, the Part 70 (326 IAC 2-7) rules do not apply. Compliance with this condition shall also ensure compliance with the grain loading limit under operation condition D.2.

The allowable PM-10 emissions has been increased from 36.0 tons per year to 84.0 tons per year.