FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Milestone Contractors, L.P.
7012 South County Road 750E
Plainfield, Indiana 46168

(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.: F063-9638-03154	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary hot drum mix asphalt plant.

Responsible Official:	Ron Terrell
Source Address:	7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address:	5950 South Belmont Avenue, P.O. Box 421459 Indianapolis, Indiana 46242-1459
SIC Code:	2951
County Location:	Hendricks
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules.

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

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

(1) one (1) asphalt counterflow drum mix dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 123 million (MM) British thermal units (Btu) per hour natural gas-fired burner, using waste oil and No. 2 distillate fuel oil as back-up fuels, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);
(2) one (1) drag slat conveyor, two (2) feed conveyors, and one (1) screen;
(3) cold-mix (stockpile mix) asphalt storage piles;
(4) two (2) 30,000 gallon liquid asphalt storage tanks (ID No. Tanks 14 and 15); and
(5) one (1) 20,000 gallon fuel oil (waste oil/No. 2 distillate fuel oil) storage tank (ID No. Tank 16).

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

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

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  (a) one (1) natural gas-fired hot oil heater, with a maximum rated capacity of 2.2 MMBtu per hour, using No. 2 fuel oil as back-up fuel, exhausting through one (1) stack (ID No. S-2); and
  (b) one (1) 0.06 MMBtu per hour, natural gas-fired, plant maintenance shop heater.

(2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour:
  (a) one (1) 0.5 MMBtu per hour propane-fired hand torch used for maintenance purposes.
(3) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight:
  (a) one (1) 0.35 MMBtu per hour No. 2 distillate fuel oil fired portable space heater.
(4) Combustion source flame safety purging on startup.
(5) 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.
(6) The following VOC and HAP storage containers:
  (a) Storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; and
  (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
(7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
(8) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(9) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100ºF) or; having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20ºC (68ºF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 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) cold feed system consisting of six (6) compartments.
(15) One (1) hot mix asphalt cement storage silo system with a maximum storage capacity of 640 tons.
(16) One (1) Reclaimed Asphalt Pavement (RAP) feed system.
(17) Aggregate storage piles, with a total maximum storage capacity of 94,038 tons.

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 Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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

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.

(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.

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM 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 copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must 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 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)] [326 IAC 2-8-5(1)]

(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(34).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 July 1 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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, 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 based on continuous or intermittent data;

(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 may require to determine the compliance status of the source.

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).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

(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 IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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

Failure to notify IDEM, OAM 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

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(34).

(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 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 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 Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

(b) A 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 is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) 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 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 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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM 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 shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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

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

(2) If IDEM, OAM, 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 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, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

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.20 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 2-8-15(a) and the following additional condition:

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.21 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

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 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(34).

(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 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.22 Construction Permit Requirement [326 IAC 2]

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.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]

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 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 2-8-10. 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(34).

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

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, except particulate matter (PM), from the entire source 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 2-2 (Prevention of Significant Deterioration (PSD));

(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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

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

C.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 forty percent (40%) 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.

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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 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). 326 IAC 6-4-2(4) is not federally enforceable.

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 April 2, 1998. The plan consists of:

(a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:

Paved roads and parking lots:
(1) power brooming while wet either from rain or application of water on an as needed basis.

Unpaved roads and parking lots:
(1) paving with asphalt;
(2) treating with emulsified asphalt on an as needed basis;
(3) treating with water on an as needed basis;
(4) double chip and seal the road surface and maintained on an as needed basis.

(b) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:

(1) maintaining minimum size and number of stock piles of aggregate;
(2) treating around the stockpile area with emulsified asphalt;
(3) treating around the stockpile area with water;
(4) treating the stockpiles with water.

(c) Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:

(1) applying water at the feed and the intermediate points.

(d) Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:

(1) minimize the vehicular distance between transfer points;
(2) enclose the transfer points;
(3) apply water on transfer points on an as needed basis.

(e) Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:

(1) tarping the aggregate hauling vehicles;
(2) maintain vehicle bodies in a condition to prevent leakage;
(3) spray the aggregates with water;
(4) maintain a 10 MPH speed limit in the yard.

(f) Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:

(1) reduce free fall distance to a minimum;
(2) reduce the rate of discharge of the aggregate;
(3) spray the aggregate with water on an as needed basis.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the 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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the 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 within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 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 may extend compliance schedule an additional ninety (90) days provided the Permittee 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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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.11 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.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable 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.13 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 (±2%) of full scale reading.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process 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 IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(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 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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to 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. 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 IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves 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 IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM 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.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.18 Monitoring Data Availability

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

(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 for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring 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

(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 on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(2) one (1) asphalt counterflow drum mix dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 123 million (MM) British thermal units (Btu) per hour natural gas-fired burner, using waste oil and No. 2 distillate fuel oil as back-up fuels, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1); and

(2) one (1) drag slat conveyor, two (2) feed conveyors, and one (1) screen.

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

D.1.1 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 15.4 pounds per hour. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

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

D.1.3 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 13.8 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.4 Sulfur Dioxide (SO_2) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 123.0 million Btu per hour burner for the aggregate dryer shall be limited to:

(a) 1.6 pounds per MMBtu heat input or a sulfur content of less than or equal to 1.5% when using waste oil; and

(b) 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using distillate oil.

D.1.5 Fuel Usage [326 IAC 2-8-4]

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

(a) the input of natural gas and natural gas equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 352.9 million (MM) cubic feet (CF) per 365 day period, rolled on a daily basis, so that NOx emissions are limited below 100 tons per year.

(b) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year.

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

(1) every 1,000 gallons of waste oil burned shall be equivalent to 0.035 MMCF of natural gas based on NOx emissions, such that the total MMCF of natural gas and natural gas equivalent input does not exceed the limit specified;
(2) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 0.036 MMCF of natural gas based on NOx emissions, such that the total MMCF of natural gas and natural gas equivalent input does not exceed the limit specified;
(3) every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO_2 emissions, such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified; and
(4) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO_2 emissions and a maximum sulfur content of 0.5 percent such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified.

Therefore, the requirements of 326 IAC 2-7 will not apply.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 48 and 54 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, 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. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.8 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 waste oil sulfur content does not exceed 0.75% by weight and the No. 2 distillate fuel oil sulfur content does not exceed 0.5% by weight 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 from the 123.0 MMBtu per hour burner for the aggregate dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

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.

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

D.1.9 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the aggregate dryer is in operation.

D.1.10 Visible Emissions Notations

(a) Daily visible emission notations of the aggregate dryer baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate dryer, at least once daily when the aggregate dryer is in operation when venting to the atmosphere. 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 IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.12 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

(b) Within twelve (12) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within twelve (12) hours of discovery of the failure and shall include a timetable for completion.

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (7) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual natural gas and natural gas equivalent usage per day since last compliance determination period and equivalent NOx emissions;

(3) Actual waste oil and waste oil equivalent usage per day since last compliance determination period and equivalent SO_2 emissions;

(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

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

(5) Fuel supplier certifications.

(6) The name of the fuel supplier; and

(7) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

(b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:

(1) Documentation of all response steps implemented, per event .

(2) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(3) Quality Assurance/Quality Control (QA/QC) procedures.

(4) Operator standard operating procedures (SOP).

(5) Manufacturer's specifications or its equivalent.

(6) Equipment "troubleshooting" contingency plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(3) cold-mix (stockpile mix) asphalt storage piles;

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-2]

Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving), the use of cutback asphalt or asphalt emulsion shall not contain more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

1) penetrating prime coating
2) stockpile storage
3) application during the months of November, December, January, February and March.

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

The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 87.0 tons per 365 consecutive day period, rolled on a daily basis. The total for each day shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous 364 days. This is equivalent to 91.6 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. During the first 365 days of operation under this permit, the usage of diluent shall be limited such that the total usage divided by the accumulated days of operation shall not exceed 502 pounds per day. Therefore, the requirements of 326 IAC 2-7 will not apply.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

(1) diluent used in production of cold mix asphalt per day;

(2) amount of diluent used last 365 days;

(3) type of liquid binder used; and

(4) percent diluent (oil distillate) in liquid binder.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(4) two (2) 30,000 gallon liquid asphalt storage tanks (ID No. Tanks 14 and 15); and
(5) one (1) 20,000 gallon fuel oil (waste oil/No. 2 distillate fuel oil) storage tank (ID No. Tank 16).

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 12] [40 CFR 60.110b, Subpart Kb]

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the two (2) 30,000 gallon liquid asphalt storage tanks and the one (1) 20,000 gallon fuel oil storage tank, each with a vapor pressure of less than 15.0 kPa, are subject to 40 CFR Part 60.116b, paragraphs (a), (b), and (c) which require record keeping.

D.3.2 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 device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.4 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain permanent records at the source in accordance with (1) through (3) below:

(1) the dimension of each storage vessel;

(2) an analysis showing the capacity of each storage vessel; and

(3) the true vapor pressure of each VOC stored, indicating that the maximum true vapor pressure of VOC is less than 15.0 kPa for Tanks 14, 15, and 16.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154

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 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

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

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(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 **Page 2 of 2**

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_2, VOC, NO_X, 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: _____

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

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154
Facility: 123 MMBtu/hr burner for the aggregate dryer
Parameter: Oxides of Nitrogen (NOx)
Limit: the input of natural gas and natural gas equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 352.9 million (MM) cubic feet (CF) per 365 day period, rolled on a daily basis. For purposes of determining compliance, every 1,000 gallons of waste oil burned shall be equivalent to 0.035 MMCF of natural gas based on NOx emissions and every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 0.036 MMCF of natural gas based on NOx emissions.

Month: _____ **Year:** _____

Day	Fuel Type	Natural Gas and Equivalent Usage This Day (MMCF)	Natural Gas and Equivalent Usage Last 364 Days (MMCF)	365 Day Total Natural Gas and Equivalent Usage (MMCF)	Day	Fuel Type	Natural Gas and Equivalent Usage This Day (MMCF)	Natural Gas and Equivalent Usage Last 364 Days (MMCF)	365 Day Total Natural Gas and Equivalent Usage (MMCF)
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									

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

FESOP Monthly Report (page 1 of 2)

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154
Facility: 123 MMBtu/hr burner for the aggregate dryer
Parameter: Sulfur Dioxide (SO_2)
Limit: the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO_2 emissions, and every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO_2 emissions and a maximum sulfur content of 0.5 percent.

Month: _____ **Year:** _____

Day	Fuel Type	Waste Oil and Equivalent Usage This Day (gallons)	Waste Oil and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Waste Oil and Equivalent Usage (gallons)	Day	Fuel Type	Waste Oil and Equivalent Usage This Day (gallons)	Waste Oil and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Waste Oil and Equivalent Usage (gallons)
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									

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

FESOP Monthly Report (page 2 of 2)

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154
Facility: 123 MMBtu/hr burner for the aggregate dryer
Parameter: Sulfur content for fuel oil combustion
Limit: The maximum sulfur content of the waste oil burned in the 123.0 MMBtu per hour burner for the aggregate dryer shall not exceed 0.75%. The maximum sulfur content of the No. 2 distillate fuel oil burned in the 123.0 MMBtu per hour burner for the aggregate dryer shall not exceed 0.5%.

Month: _____ Year: _____

Day	Fuel Type	Sulfur Content of Fuel Oils (%)	Heat Content of Fuel Oils (Btu/gal)	Day	Fuel Type	Sulfur Content of Fuel Oils (%)	Heat Content of Fuel Oils (Btu/gal)
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							

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

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154
Facility: cold-mix (stockpile mix) asphalt storage piles
Parameter: volatile organic compounds (VOC)
Limit: The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 87.0 tons per 365 consecutive day period, rolled on a daily basis. This is equivalent to 91.6 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. During the first 365 days of operation under this permit, the usage of diluent shall be limited such that the total usage divided by the accumulated days of operation shall not exceed 502 pounds per day.

Month: _____ **Year:** _____

Day	Diluent Usage This Day (tons)	Diluent Usage Last 364 days (tons)	365 Day Total Diluent Usage (tons)	Day	Diluent Usage This Day (tons)	Diluent Usage Last 364 days (tons)	365 Day Total Diluent Usage (tons)
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							

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

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

Source Name: Milestone Contractors, L.P.
Source Address: 7012 South County Road 750E, Plainfield, Indiana 46168
Mailing Address: 5950 South Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
FESOP No.: F063-9638-03154

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring 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 in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

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

Source Background and Description

Source Name: **Milestone Contractors, L.P.**
Source Location: **7012 South County Road 750E, Plainfield, Indiana 46168**
County: **Hendricks**
SIC Code: **2951**
Operation Permit No.: **F063-9638-03154**
Permit Reviewer: **Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Milestone Contractors, L.P. relating to the operation of a hot drum mix asphalt plant.

Permitted Emission Units and Pollution Control Equipment

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

(1) one (1) asphalt counterflow drum mix dryer capable of processing 400 tons per hour of raw material, equipped with one (1) 123 million (MM) British thermal units (Btu) per hour natural gas-fired burner, using re-refined waste oil and No. 2 distillate fuel oil as back-up fuels, with one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);
(2) one (1) drag slat conveyor, two (2) feeder conveyors, and one (1) screen;
(3) cold-mix (stockpile mix) asphalt storage piles;
(4) two (2) 30,000 gallon liquid asphalt storage tanks (ID No. Tanks 14 and 15); and
(5) one (1) 20,000 gallon fuel oil (re-refined waste oil/No. 2 distillate fuel oil) storage tank (ID No. Tank 16).

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

New Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(a) one (1) natural gas-fired hot oil heater, with a maximum rated capacity of 2.2 MMBtu per hour, using No. 2 fuel oil as back-up fuel, exhausting through one (1) stack (ID No. S-2); and
(b) one (1) 0.06 MMBtu per hour, natural gas-fired, plant maintenance shop heater.

(2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour:

(a) one (1) 0.5 MMBtu per hour propane-fired hand torch used for maintenance purposes.

(3) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight:

(a) one (1) 0.35 MMBtu per hour No. 2 distillate fuel oil fired portable space heater.

(4) Combustion source flame safety purging on startup.

(5) 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.

(6) The following VOC and HAP storage containers:

(a) Storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; and

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(8) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(9) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100ºF) or; having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20ºC (68ºF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 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(21)(C).

(14) One (1) cold feed system consisting of six (6) compartments.

(15) One (1) hot mix asphalt cement storage silo with a maximum storage capacity of 640 tons.

(16) One (1) Reclaimed Asphalt Pavement (RAP) feed system.

(17) Aggregate storage piles, with a total maximum storage capacity of 94,038 tons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP-063-6711-03154, issued on February 13, 1997.

All conditions from previous approvals were incorporated into this FESOP.

(Note: Pursuant to this permit, this source was required to apply for a Title V operating permit within 12 months of April 7, 1997, which was the date the Affidavit of Construction was received. This FESOP application was received on April 2, 1998, in compliance with this requirement.)

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 April 2, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (14 pages).

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	33,635.6
PM-10	7,947.4
SO_2	429.9
VOC	2,467.8
CO	22.0
NO_x	298.3

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

HAP's	Potential Emissions (tons/year)
Acetaldehyde	2.28
Acrolein	0.05
Arsenic	0.42
Benzene	0.72
Cadmium	0.04
Chromium	0.08
Ethylbenzene	0.67
Formaldehyde	4.21
Lead	1.52
Manganese	0.26
Methyl Ethyl Ketone	0.04
Nickel	0.04
Propionaldehyde	0.23
Quinone	0.28
Toluene	1.31
POM	1.02
Xylene	0.28
TOTAL	13.43

(a) The potential emissions (as defined in 326 IAC 1-2-55) of PM-10, SO_2, NOx, and VOC 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 PM-10 of less than 100 tons per year. Source wide PM-10 emissions are controlled at 29.2 tons per year, consisting of:

(i) 10.88 tons per year for the significant activities; and

(ii) 18.33 tons per year for the insignificant activities.

(b) The source has accepted a federally enforceable limit on potential to emit SO_2 of less than 100 tons per year, consisting of:

(i) 93.33 tons per year for the significant activities; and

(ii) 5.67 tons per year for the insignificant activities.

(c) The source has accepted a federally enforceable limit on potential to emit NOx of less than 100 tons per year, consisting of:

(i) 97.04 tons per year for the significant activities; and

(ii) 1.96 tons per year for the insignificant activities.

(d) The source has accepted a federally enforceable limit on potential to emit VOC of less than 100 tons per year, consisting of:

(i) 98.92 tons per year for the significant activities; and
(ii) 0.08 tons per year for the insignificant activities.

(e) 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_2	VOC	CO	NO_X	HAPs
Aggregate drying	42.68	9.93	93.33	11.92	7.06	97.04	11.07
Conveying/Handling	1.99	0.95	0.0	0.0	0.0	0.0	0.0
Cold-mix VOC storage	0.0	0.0	0.0	87.0	0.0	0.0	0.0
Insignificant Activities	52.15	18.33	5.67	0.08	0.45	1.96	0.0
Total Emissions	96.8	29.2	99.0	99.0	7.5	99.0	11.1

County Attainment Status

The source is located in Hendricks County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Hendricks County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.90, Subpart I) because it meets the definition of a hot mix asphalt facility pursuant to the rule and it was constructed after June 11, 1973. This rule limits particulate matter emissions to 0.04 grains per dry standard cubic foot (gr/dscf) and also limits visible emissions to 20% opacity. This is equivalent to a particulate matter emission rate of 12.7 pounds per hour. Based on the assumption that the majority of PM emissions exiting a baghouse are PM-10 emissions, the PM-10 emissions shall also be limited to 12.7 pounds per hour. The source will comply with this rule by using a baghouse to limit particulate matter emissions to less than 0.04 gr/dscf (see Appendix A, page 14 of 14, for detailed calculations).

(b) The two (2) 30,000 gallon liquid asphalt storage tanks (Tanks 14 and 15) and the one (1) 20,000 gallon fuel oil storage tank (Tank 16) are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because each tank was constructed after July 23, 1984, and each has a storage capacity greater than 40 cubic meters. However, since each of the tanks has a storage capacity greater than 75 cubic meters but less than 151 cubic meters, and the liquid stored in each tank has a maximum true vapor pressure of less than 15.0 kPa, the tanks are subject to only 40 CFR Part 60.116b, paragraphs (a), (b), and (c) which require record keeping.

(c) The Reclaimed Asphalt Pavement (RAP) feed system is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.670, Subpart OOO). This system consists of two (2) bins with collector belts and a feed conveyor. There is no equipment associated with this system that is used to crush or grind any nonmetallic mineral, therefore, it is not subject to the requirements of Subpart OOO.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of PM-10, SO_2, NOx, and VOC to below 100 tons per year per pollutant. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of natural gas and natural gas equivalents shall be limited to 352.9 million (MM) cubic feet per 365 day period, rolled on a daily basis, so that NOx emissions are limited below 100 tons per year. The usage of re-refined waste oil with a sulfur content of 0.75% and re-refined waste oil equivalents shall be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year. The usage of gelled asphalt binder in the production of cold-mix (stockpile mix) asphalt shall be limited to 8,700 tons per year so that VOC emissions are limited below 100 tons per year. Also, PM-10 emissions from the aggregate dryer shall be limited to 12.7 pounds per hour per the requirements of 40 CFR 60.90, Subpart I. The source will comply with the PM-10 emission limit by utilizing a baghouse for controlling PM-10 emissions to 2.3 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

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 forty percent (40%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source which has not received all the necessary preconstruction approvals before December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. The fugitive dust control plan for this source includes the following:

(a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:

Paved roads and parking lots:
(1) power brooming while wet either from rain or application of water on an as needed basis.

Unpaved roads and parking lots:
(1) paving with asphalt;
(2) treating with emulsified asphalt on an as needed basis;
(3) treating with water on an as needed basis;
(4) double chip and seal the road surface and maintained on an as needed basis.

(b) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:

(1) maintaining minimum size and number of stock piles of aggregate;
(2) treating around the stockpile area with emulsified asphalt;
(3) treating around the stockpile area with water;
(4) treating the stockpiles with water.

(c) Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:

(1) applying water at the feed and the intermediate points.

(d) Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:

(1) minimize the vehicular distance between transfer points;
(2) enclose the transfer points;
(3) apply water on transfer points on an as needed basis.

(e) Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:

(1) tarping the aggregate hauling vehicles;
(2) maintain vehicle bodies in a condition to prevent leakage;
(3) spray the aggregates with water;
(4) maintain a 10 MPH speed limit in the yard.

(f) Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:

(1) reduce free fall distance to a minimum;
(2) reduce the rate of discharge of the aggregate;
(3) spray the aggregate with water on an as needed basis.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The aggregate mixing and drying operation is not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is not consistent with applicable limitations in 326 IAC 6-1 or 326 IAC 12. Since the applicable PM limit established by 326 IAC 12, 40 CFR 60, Subpart I, is less than the PM limit that would be established by 326 IAC 6-3-2 (66.3 pounds per hour, see Appendix A, page 14 of 14), the more stringent limit applies and the limit pursuant to 326 IAC 6-3-2 does not apply.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The sulfur dioxide emissions from the 123 MMBtu/hr dryer burning re-refined waste oil shall be limited to 1.6 pounds per MMBtu heat input. This equates to a fuel oil sulfur content limit of 1.5%. Therefore, the sulfur content of the fuel must be less than or equal to 1.5% in order to comply with this rule (See Appendix A, Page 14 of 14 for detailed calculations). The source will comply with this rule by using re-refined waste oil with a sulfur content of 0.75% or less. The sulfur dioxide emissions from the 123 MMBtu/hr dryer burning distillate oil shall be limited to 0.5 lb/MMBtu heat input. This equates to a fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the fuel must be less than or equal to 0.5% in order to comply with this rule (See Appendix A, Page 14 of 14 for detailed calculations). The source will comply with this rule by using No. 2 distillate fuel oil with a sulfur content of 0.5% or less.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

This source is subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Management upon request records of sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates based on a calendar-month average.

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

No person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

1) penetrating prime coating
2) stockpile storage
3) application during the months of November, December, January, February and March.

This source uses gelled asphalt to manufacture stockpile mix on a limited basis. The gelled asphalt contains a maximum of 1% oil distillate by volume. It is only manufactured during late November or early December and/or late March or early April and is in compliance with 326 IAC 8-5-2.

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 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 Section D of the permit 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 Section D of the permit. 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:

1. The combustion of natural gas, re-refined waste oil and No. 2 distillate fuel oil in the aggregate dryer burner has applicable compliance monitoring conditions as specified below:

   (a) the consumption of natural gas and its equivalents in the aggregate dryer burner is limited to 352.9 MMCF per 365 day period, rolled on a daily basis, in order to ensure compliance with 326 IAC 2-8 (FESOP).

   (b) the consumption of re-refined waste oil and its equivalents for the entire source must be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, based on a maximum sulfur content of 0.75% for re-refined waste oil and a maximum sulfur content of 0.5% for No. 2 distillate fuel oil, in order to ensure compliance with 326 IAC 2-8 (FESOP).

   (c) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include:
      (1) the daily usages of natural gas, re-refined waste oil, and No. 2 distillate fuel oil expressed as natural gas equivalents in MMCF for NOx emissions;
      (1) the daily usages of natural gas, re-refined waste oil and No. 2 distillate fuel oil expressed as re-refined waste oil equivalents in gallons for SO_2 emissions; and
      (2) sulfur content and heating value of the fuel oils.

   These monitoring conditions are necessary because NOx and SO_2 emissions from the combustion of natural gas, re-refined waste oil and No. 2 fuel oil must be limited such that source-wide NOx and SO_2 emissions are below the Title V major source level of 100 tons per year to comply with 326 IAC 2-8-4. Additionally, the sulfur content of the fuel oils must comply with 326 IAC 7-1.1.

2. The production of cold-mix (stockpile mix) asphalt has applicable compliance monitoring conditions as specified below:

   (a) The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 87.0 tons per 365 twelve (12) consecutive month period, rolled on a monthly basis in order to ensure compliance with 326 IAC 2-8 (FESOP). This is equivalent to 8,700 tons of gelled asphalt binder used per year in the production

of cold-mix (stockpile mix) asphalt based on 7.0% binder present in the stockpile mix.

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include the amount of gelled asphalt binder used per year, rolled on a monthly basis.

These monitoring conditions are necessary because VOC emissions from the production of cold-mix (stockpile mix) asphalt concrete must be limited such that source-wide VOC emissions are below the Title V major source level of 100 tons per year to comply with 326 IAC 2-8-4. Additionally, the source must demonstrate compliance with 326 IAC 8-5-2.

3. The conveying, material transfer points, screening, unpaved roads, storage piles, mixing and drying operation have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the conveyors, material transfer points, screening, unpaved roads, storage piles, and mixer/dryer stack 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 mixing and drying operation, at least once daily when the aggregate dryer 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 and 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 for the mixing and drying operation must operate properly to ensure compliance with 40 CFR Part 60.90 (Subpart I-Standards of Performance for Hot Mix Asphalt Facilities), and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations (Appendix A, page 12 of 14).

Conclusion

The operation of this hot drum mix asphalt plant shall be subject to the conditions of the attached proposed **FESOP No. F063-9638-03154.**

Indiana Department of Environmental Management
Office of Air Management

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

Source Name:	**Milestone Contractors, L.P.**
Source Location:	**7012 South County Road 750E** **Plainfield, Indiana 46168**
SIC Code:	**2951**
County:	**Hendricks**
Operation Permit No.:	**F063-9638-03154**
Permit Reviewer:	**Trish Earls/EVP**

On July 20, 1998, the Office of Air Management (OAM) had a notice published in the Weekend Flyer, Plainfield, Indiana, stating that Milestone Contractors, L.P. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary hot drum mix asphalt plant. The notice also stated that OAM 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 OAM has decided to make the following changes to the FESOP:

1) A.5 Prior Permit Conditions is a new condition.

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

2) Condition B.26, Credible Evidence, has been taken out of all FESOPs.

~~B.26 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Register 8313][326 IAC 2-8-5]~~

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~

On August 14, 1998, Denis Drysdale submitted comments on behalf of Milestone Contractors, L.P. The summary of the comments and responses is as follows:

Comment #1

In section A.2 and D.1, please change "feeder conveyors" to "feed conveyors", as it means a different type of conveyor within our industry. Please make the same change in the Permitted Emission Units and Pollution Control Equipment section of the TSD.

Response #1

Item (2) under the Permitted Emission Units and Pollution Control Equipment section of the TSD, page 1 of 11, and item (2) under sections A.2 and D.1 of the FESOP, pages 5 and 27 of 42, has been revised to read as follows (changes in strikeout):

(2) one (1) drag slat conveyor, two (2) feed~~er~~ conveyors, and one (1) screen;

Comment #2

Please clarify item (15) of section A.3 to read "one (1) hot mix asphalt cement storage silo system with a maximum storage capacity of 640 tons".

Response #2

Item (15) of section A.3 of the FESOP, page 6 of 42, and item (15) of the Insignificant Activities section of the TSD, page 2 of 11, has been revised to read as follows (changes in bold):

(15) One (1) hot mix asphalt cement storage silo **system** with a maximum storage capacity of 640 tons.

Comment #3

As we have reviewed current IDEM, OAM, written in-house, FESOPs for asphalt plants we see that in condition D.1.1, on page 27 of 42, the limit of 0.04 grains per dry standard cubic foot (gr/dscf) would be equivalent to a particulate matter emission rate of 15.42 pounds per hour instead of the 12.7 pounds per hour listed here. We would ask that the calculations to derive this PM limit be updated to conform with current IDEM, OAM, written in-house, FESOPs for asphalt plants.

Response #3

Previously, the particulate matter emission limit pursuant to 40 CFR 60.90, Subpart I, was calculated assuming a 20% moisture content of the exhaust gas through the mixing and drying operation stack. It has been determined that this assumption is too high. The limit has been re-calculated using the moisture content of the aggregate as the moisture content of the exhaust gas. Therefore, the calculations to derive this limit have been revised (see Appendix A, page 14 of 14). Also, a separate limit for PM-10 emissions has been added to the FESOP. Condition D.1.1 has been revised as follows (changes in bold or strikeout):

D.1.1 Particulate Matter (PM) ~~and Particulate Matter Less Than 10 Microns (PM-10)~~ [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of ~~12.7~~ **15.4** pounds per hour. ~~PM-10 emissions shall also be limited to 12.7 pounds per hour. These limits~~ **This limit** will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. ~~and will satisfy the requirements of 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.~~

Comment #4

As we have reviewed current IDEM, OAM, written in-house, FESOPs for asphalt plants we see that PM-10 emissions exiting an asphalt plant baghouse are no longer considered to be less than or equal to the PM emissions. As footnoted in one asphalt plant FESOP TSD it says, "Based on differences in the testing methods which demonstrate compliance for PM and PM-10 limitations, the PM-10 limitation pursuant to 326 IAC 2-8-4 is greater than the PM limitation pursuant to 326 IAC 6-1 because it includes the condensible portions in addition to filterable PM-10." Further we see PM-10 emission limits as a separate condition from PM emission limits. Our calculations that follow mirroring current, IDEM, OAM, written in-house, FESOP calculations show a PM-10 limit of 14.13 pounds per hour instead of the 12.7 pounds per hour listed here. We would ask that a separate condition be established for PM-10 in this FESOP, and that the PM-10 limit be updated to conform with current IDEM, OAM, written in-house, FESOPs for asphalt plants.

Response #4

Since 40 CFR 60.90, Subpart I does not refer to PM-10 emissions, it is incorrect to limit PM-10 emissions based on this rule. Therefore, a new condition has been added to the FESOP containing a separate limit for PM-10. Based on the emission calculations, the PM-10 limit for the mixing and drying operation is 13.8 pounds per hour. This was calculated by subtracting the uncontrolled PM-10 emissions from the other emission units at the source from 99.0 tons per year. The new condition, numbered D.1.3, reads as follows:

D.1.3 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 13.8 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

Conditions D.1.3 through D.1.13 have been re-numbered as D.1.4 through D.1.14.

Comment #5

In condition D.1.4, Fuel Oil Usage, on page 27 of 42 of the FESOP, we would ask that the word oil be deleted, as Fuel Usage is more descriptive of this condition which includes more than oil.

In part (b) of this condition, we would ask that the words re-refined be deleted as we do not see IDEM, OAM, written in-house FESOPs for asphalt plants with this name prior to waste oil, and we have been told by IDEM, OAM, Permit Section it is not the intent of IDEM, OAM, to limit waste oil fuel burned in the facility beyond the used oil requirements specified in 326 IAC 13 (Used Oil Management).

We have operated under the Construction Permit/Operating Permit at this facility for over 365 days, therefore, we are keeping records as per a 365 day period, rolled on a daily basis, and we submitted them this way to IDEM Compliance Data Section for the last part of the last quarter. Upon issuance of this permit, do parts (d) and (e) of this condition say we will have to start all over again using the daily limits? We would ask to continue on the 365 day period, rolled on a daily basis utilizing the fuel limits of this FESOP.

Response #5

The word Oil has been deleted from the title of Condition D.1.4 (now re-numbered as D.1.5), on page 27 of 42, of the FESOP. The word re-refined has been deleted from this condition and all other places that it previously appeared in this FESOP as it is not necessary.

Since this source has already been operating for over 365 days and has been keeping records of fuel usage, rolled on a daily basis, to comply with the fuel usage limitations in the current Construction Permit, parts (d) and (e) of this condition have been deleted.

The revised condition D.1.4, now re-numbered as D.1.5, reads as follows (changes in strikeout):

D.1.5 Fuel ~~Oil~~ Usage [326 IAC 2-8-4]

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

(a) the input of natural gas and natural gas equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 352.9 million (MM) cubic feet (CF) per 365 day period, rolled on a daily basis, so that NOx emissions are limited below 100 tons per year.

(b) the input of ~~re-refined~~ waste oil with a maximum sulfur content of 0.75% and ~~re-refined~~ waste oil equivalents to the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year.

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

(1) every 1,000 gallons of ~~re-refined~~ waste oil burned shall be equivalent to 0.035 MMCF of natural gas based on NOx emissions, such that the total MMCF of natural gas and natural gas equivalent input does not exceed the limit specified;

(2) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 0.036 MMCF of natural gas based on NOx emissions, such that the total MMCF of natural gas and natural gas equivalent input does not exceed the limit specified;

(3) every MMCF of natural gas burned shall be equivalent to 5.4 gallons of ~~re-refined~~ waste oil based on SO_2 emissions, such that the total gallons of ~~re-refined~~ waste oil and ~~re-refined~~ waste oil equivalent input does not exceed the limit specified; and

(4) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of ~~re-refined~~ waste oil based on SO_2 emissions and a maximum sulfur content of 0.5 percent such that the total gallons of ~~re-refined~~ waste oil and ~~re-refined~~ waste oil equivalent input does not exceed the limit specified.

~~(d) 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 days of operation shall not exceed 0.96 MMCF per day.~~

~~(e) During the first 365 days of operation under this permit, the input of re-refined waste oil and re-refined waste oil equivalents shall be limited such that the total gallons divided by the accumulated days of operation shall not exceed 4,638 U.S. gallons per day.~~

Therefore, the requirements of 326 IAC 2-7 will not apply.

Comment #6

In condition D.1.11, on page 30 of 42, of the FESOP, we would ask that the 8 be changed to 12 which could be a sometime shift, and which IDEM had no problem with in written comments the industry submitted on the model compliance monitoring plan for fabric filter for asphalt plants.

Response #6

On November 11, 1998, Denis Drysdale of Milestone Contractors, L.P. submitted a letter from Ed Stresino of the OAM written on June 17, 1996, to Lloyd Bandy of the asphalt pavement association addressing comments the association made on the model Compliance Monitoring Plan prepared by the OAM. In the letter, Mr. Stresino did not have a problem changing the response time from 8 hours to 12 hours. Therefore, the response time required in the event of baghouse failure in condition D.1.11, now re-numbered as D.1.12, shall be changed from 8 hours to 12 hours. The revised condition now reads as follows (changes in bold or strikeout):

D.1.12 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

(b) Within ~~eight (8)~~ **twelve (12)** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within ~~eight (8)~~ **twelve (12)** hours of discovery of the failure and shall include a timetable for completion

Comment #7

In condition D.1.12, we think the recording condition for cleaning cycle, part (c)(1)(B), should be deleted. On an asphalt plant baghouse, the cleaning cycle frequency can be set so it's automatically variable depending on conditions and the differential pressure is being recorded as per part (A) of the condition.

We understand that part (c)(8) of condition D.1.12 relates to the woodworking industry where baghouse vents can be directed to the outside atmosphere or inside atmosphere. This being an asphalt plant, we ask that this condition be deleted.

Response #7

The OAM has decided that keeping records of the cleaning cycle frequency is not necessary in this case and can be deleted from the operational parameters to be monitored. Also, since records are already being kept on the differential pressure of the baghouse, this parameter can also be deleted from part (c).

Part (c)(8) of condition D.1.12 has been deleted as it only relates to the woodworking industry.

The revised condition D.1.12, now re-numbered as D.1.13, now reads as follows (changes in strikeout):

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions ~~D.1.3 and~~ D.1.4 **and D.1.5**, the Permittee shall maintain records in accordance with (1) through (7) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual natural gas and natural gas equivalent usage per day since last compliance determination period and equivalent NOx emissions;

(3) Actual ~~re-refined~~ waste oil and ~~re-refined~~ waste oil equivalent usage per day since last compliance determination period and equivalent SO_2 emissions;

(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

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

(5) Fuel supplier certifications.

(6) The name of the fuel supplier; and

(7) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

(b) To document compliance with Condition ~~D.1.9~~ **D.1.10**, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.

(c) To document compliance with Condition ~~D.1.10~~ **D.1.11**, the Permittee shall maintain the following:

~~(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

~~(2)~~**(1)** Documentation of all response steps implemented, per event .

~~(3)~~**(2)** Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

~~(4)~~**(3)** Quality Assurance/Quality Control (QA/QC) procedures.

~~(5)~~**(4)** Operator standard operating procedures (SOP).

~~(6)~~**(5)** Manufacturer's specifications or its equivalent.

~~(7)~~**(6)** Equipment "troubleshooting" contingency plan.

~~(8) Documentation of the dates vents are redirected.~~

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment #8

In condition D.1.13, on page 31 of 42, of the FESOP, something is not correct, and we assume condition D.1.5 should be deleted and replaced with condition D.1.4.

Response #8

Due to a typographical error in condition D.1.13, a quarterly summary of the information to document compliance with condition D.1.5 was incorrectly required. The condition should have required a quarterly summary to document compliance with condition D.1.4. However, due to the addition of a new condition D.1.3, conditions D.1.3 through D.1.13 have been re-numbered as D.1.4 through D.1.14. Therefore, the quarterly reports are necessary to document compliance with condition D.1.5, which contains the fuel usage limitations. Thus, the condition will remain unchanged.

Comment #9

As we have reviewed current IDEM, OAM, written in-house, FESOPs for asphalt plants we noted this condition has evolved: “The VOC emitted from the production of cold mix (stockpile mix) asphalt shall be limited to 98.07 tons per 365 day period, rolled on a daily basis. This is equivalent to 103.2 tons of diluent used per 365 day period in the production of asphalt based on 95% volatilization. During the first 365 days of operation, the diluent usage shall be limited such that the total usage divided by the accumulated days of operation shall not exceed 565 pounds per day. Therefore, 326 IAC 2-3 (Emission Offset) and the Part 70 rule (326 IAC 2-7) do not apply.” We would ask that condition D.2.2, on page 32 of 42, of the FESOP, be updated to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #9

VOC emissions from cold mix (stockpile mix) production were calculated based on the use of gelled asphalt binder as stated in the permit application. However, to enable the source to use cutback asphalt if necessary, which would be a worst case scenario, the VOC emission calculations for cold mix production have been revised based on the use of cutback asphalt containing diluent with 95% volatilization. The limit for VOC usage in cold mix production has been revised to a 365 day rolling limit per the applicant's request and has been re-worded based on the revised emission calculations.

Therefore, condition D.2.2 is revised to read as follows (changes in bold or strikeout):

D.2.2 Cold-Mix (Stockpile Mix) ~~Asphalt Concrete~~ **VOC** Usage [326 IAC 2-8-4]

The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 87.0 tons per ~~twelve (12) consecutive months, rolled on a monthly basis~~ **365 consecutive day period, rolled on a daily basis**. The total for each ~~month~~ **day** shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous ~~eleven (11) months~~ **364 days**. This is equivalent to ~~8,700 tons of gelled asphalt binder used per year in the production of cold-mix (stockpile mix) asphalt based on 7.0 percent by weight of the stockpile mix being gelled asphalt, which contains 1.0 percent by weight distillate oil~~ **91.6 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization**. During the first ~~twelve (12) months~~ **365 days** of operation under this permit, the usage of ~~gelled asphalt binder~~ **diluent** shall be limited such that the total ~~tons~~ **usage** divided by the accumulated ~~months~~ **days** of operation shall not exceed ~~725 tons per month~~ **502 pounds per day**. Therefore, the requirements of 326 IAC 2-7 will not apply.

The Quarterly Report form has also been revised to include the revised emission limit. The State Rule Applicability - Entire Source section of the TSD, on page 6 of 11, discussing the applicability of 326 IAC 2-8-4 now reads as follows (changes in bold or strikeout):

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of natural gas and natural gas equivalents **in the 123.0 MMBtu per hour burner for the aggregate dryer** shall be limited to 352.9 million (MM) cubic feet per 365 day period, rolled on a daily basis, so that NOx emissions are limited below 100 tons per year. The usage of ~~re-refined~~ waste oil with a sulfur content of 0.75% and ~~re-refined~~ waste oil equivalents **in the 123.0 MMBtu per hour burner for the aggregate dryer** shall be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year. The usage of ~~gelled asphalt binder~~ **diluent** in the production of cold-mix (stockpile mix) asphalt shall be limited to ~~8,700~~ **91.6** tons per year so that VOC emissions are limited below 100 tons per year. Also, PM-10 emissions from the aggregate dryer shall be limited to ~~12.7~~ **13.8** pounds per hour. ~~per the requirements of 40 CFR 60.90, Subpart I.~~ The source will comply with the PM-10 emission limit by utilizing a baghouse for controlling PM-10 emissions to ~~2.3~~ **12.4** pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

Comment #10

We believe that condition D.2.3, Preventive Maintenance Plan, of the FESOP should be deleted in consideration of the facility (asphalt storage piles).

Response #10

Because VOC emissions from cold mix production can only be controlled by limiting production, a Preventive Maintenance Plan is not feasible for this operation. Therefore, condition D.2.3 will be deleted. Conditions D.2.4 through D.2.6 will be re-numbered as conditions D.2.3 through D.2.5.

Comment #11

In order to keep track of the amount of diluent used in the production of cold mix asphalt, we would suggest the following changes to condition D.2.5 (a) of the FESOP:

(1) amount of diluent used in the production of cold mix asphalt per day
(2) amount of diluent used last 365 days
(3) type of liquid binder
(4) percent diluent (oil distillate) in liquid binder

Response #11

Because of the revisions to the VOC emission limit for cold mix production as noted in Response #9 above, condition D.2.5(a), now re-numbered as D.2.4(a), is revised to read as follows:

D.2.~~5~~**4** Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

(1) ~~gelled asphalt binder~~ **diluent** used ~~in current month~~ **in production of cold mix asphalt per day**;

(2) ~~gelled asphalt binder used last twelve (12) months~~ **amount of diluent used last 365 days**;

(3) type of ~~asphalt~~ **liquid binder** used; and

(4) percent ~~fuel oil in asphalt~~ **diluent (oil distillate) in liquid binder**.

Comment #12

To date we have not seen a usage last 364 days column on the FESOP Monthly Reports, and we would ask that it be deleted from the Monthly Reports for the NOx and SO_2 limits.

Response #12

The current Quarterly Report forms for daily rolling limits include a column for usage last 364 days to more clearly show compliance with the 365 day rolling limit. Therefore, the report form will not be changed.

Comment #13

We would ask that the Quarterly Report form for VOC be changed to reflect the current IDEM, OAM written in-house FESOPs for asphalt plants limit on diluent usage. We would also ask that this be a pounds per day limit, and we further ask that there not be a usage last 364 days column.

Response #13

The Quarterly Report form will be revised to reflect the revised VOC usage limit for cold mix production. The form will be changed to a daily rolling report form.

Comment #14

As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants, we have noted that in the TSD under Potential Emissions, VOC is being listed as greater than 100 tons per year. Further, in our review of current IDEM, OAM written in-house FESOPs for asphalt plants, we see that IDEM uses 0.0058 pounds per ton for HAPs. We would ask that these emissions calculations and recordings be updated in the TSD, page 3 of 11, to conform with current IDEM, OAM written in-house FESOPs for asphalt plants.

Response #14

Based on current IDEM, OAM guidance, TSDs for FESOPs must show the value of the potential emissions, and not just state if the emissions are greater than or less than major source levels. However, the Potential Emissions table is revised to reflect revisions to the VOC emission calculation for cold mix production assuming the use of cutback asphalt as a worst case scenario. The revised table is as follows:

Pollutant	Potential Emissions (tons/year)
PM	33,635.7
PM-10	7,947.5
SO_2	429.9
VOC	58,882.2
CO	22.0
NO_x	298.3

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

Comment #15

As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants, we see in the TSD under Limited Potential to Emit, the following:

(a) The source has accepted a federally enforceable limit on potential to emit particulate matter 10 microns or less in diameter (PM-10) of 99.0 tons per year consisting of:

(i) 61.92 tons per year for the Drum Dryer, Burner, & Mixer; and

(ii) 37.08 tons per year for the other, unlimited and uncontrolled activities.

We would ask that the Limited Potential to Emit section for PM-10, on page 4 of 11, be updated to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #15

The TSD was written following the most recent template document. All limits are expressed as being less than the major source level, in this case, less than 100 tons per year, and the limited emissions are always divided into emissions from significant emission units and insignificant emission units. However, section (a) is revised to state the maximum allowable PM-10 emissions from the aggregate dryer instead of the controlled PM-10 emissions. The table is also revised to reflect this change and to reflect revisions in conveying/handling PM and PM-10 emission calculations. Particulate matter emissions from the conveying/handling operations are now calculated using section 13.2.4 of U.S. EPA's AP-42 since this method is believed to be more accurate for asphalt plant operations. The uncontrolled fugitive emissions from conveying/handling and the insignificant activities are listed in the table since controls on these sources are not federally enforceable. The revised Limited Potential to Emit section of the TSD now reads as follows (changes in bold or strikeout):

Limited Potential to Emit

(a) The source has accepted a federally enforceable limit on potential to emit PM-10 of less than 100 tons per year~~. Source wide PM-10 emissions are controlled at 29.2 tons per year~~, consisting of:

(i) ~~10.88~~ **62.46** tons per year for the significant activities; and

(ii) 36.53 tons per year for the insignificant activities.

(b) The source has accepted a federally enforceable limit on potential to emit SO_2 of less than 100 tons per year, consisting of:

(i) 93.33 tons per year for the significant activities; and

(ii) 5.67 tons per year for the insignificant activities.

(c) The source has accepted a federally enforceable limit on potential to emit NOx of less than 100 tons per year, consisting of:

(i) 97.04 tons per year for the significant activities; and

(ii) 1.96 tons per year for the insignificant activities.

(d) The source has accepted a federally enforceable limit on potential to emit VOC of less than 100 tons per year, consisting of:

(i) 98.92 tons per year for the significant activities; and

(ii) 0.08 tons per year for the insignificant activities.

(e) 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_2	VOC	CO	NO_X	HAPs
Aggregate ~~drying~~ **drum mix dryer**	~~42.68~~ **67.52**	~~9.93~~ **60.49**	93.33	11.92	7.06	97.04	11.07
Conveying/Handling	~~1.99~~ **4.16**	~~0.95~~ **1.97**	0.0	0.0	0.0	0.0	0.0
Cold-mix VOC storage	0.0	0.0	0.0	87.0	0.0	0.0	0.0
Insignificant Activities	~~52.15~~ **104.13**	~~18.33~~ **36.53**	5.67	0.08	0.45	1.96	0.0
Total Emissions	~~96.8~~ **175.8**	~~29.2~~ **99.0**	99.0	99.0	7.5	99.0	11.1

Comment #16

As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants, we see in the Limited Potential to Emit section of the TSD, the following:

(d) The source has accepted a federally enforceable limit on potential to emit volatile organic compounds VOC of 99.0 tons per year consisting of:

(i) 98.07 tons per year for the production of cold mix asphalt;
(ii) 0.85 tons per year for the limited dryer combustion activities; and
(iii) 0.08 ton per year for the insignificant activities.

We would ask that the Limited Potential to Emit for VOC be updated to conform with current IDEM, OAM written in-house FESOPs for asphalt plants.

Also, we would ask that the Limited Potential to Emit table entries be updated to conform with current IDEM, OAM written in-house, FESOPs for asphalt plants.

Response #16

The TSD was written following the most recent template document. All limits are expressed as being less than the major source level, in this case, less than 100 tons per year, and the limited emissions are always divided into emissions from significant emission units and insignificant emission units. The limited emissions from each emission unit can be seen on the Limited Potential to Emit table. The revised table entries can be seen in Response #15 above.

Comment #17

As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants, in the Federal Rule Applicability section of the TSD, we see:

(a) ..... This is equivalent to a particulate matter emission rate of 15.42 pounds per hour.

We would ask that this PM limit be updated to conform with current IDEM, OAM, written in-house, FESOPs for asphalt plants. As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants we see that PM-10 emissions exiting an HMA facility baghouse are no longer considered to be less than or equal to the PM emissions, as specified in a FESOP TSD: "Based on differences in the testing methods which demonstrate compliance for PM and PM-10 limitations, the PM-10 limitation pursuant to 326 IAC 2-8-4 is greater than the PM limitation pursuant to 326 IAC 6-1 because it includes the condensible portions in addition to filterable PM-10." Further we see PM-10 emissions limits as a separate condition from PM emission limits. Our calculations that follow mirroring current IDEM, OAM, in-house FESOPs calculations show a PM-10 limit for PM-10 emissions exiting this baghouse should be limited to 14.13 pounds per hour. We would ask that a separate condition be established for PM-10 and that the PM-10 limit be updated to conform with current IDEM, OAM written in-house FESOPs for asphalt plants.

Response #17

Based on the inclusion of a separate PM-10 limit in the FESOP, as discussed in Response #4 on page 3 above, and changes in the calculation of the equivalent pounds per hour limit for Subpart I, as discussed in Response #3 on page 2 above, paragraph (a) of the Federal Rule Applicability section of the TSD is revised to read as follows (changes in bold or strikeout):

(a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.90, Subpart I) because it meets the definition of a hot mix asphalt facility pursuant to the rule and it was constructed after June 11, 1973. This rule limits particulate matter emissions to 0.04 grains per dry standard cubic foot (gr/dscf) and also limits visible emissions to 20% opacity. This is equivalent to a particulate matter emission rate of ~~12.7~~ **15.4** pounds per hour. ~~Based on the assumption that the majority of PM emissions exiting a baghouse are PM-10 emissions, the PM-10 emissions shall also be limited to 12.7 pounds per hour.~~ The source will comply with this rule by using a baghouse to limit particulate matter emissions to less than 0.04 gr/dscf (see Appendix A, page 14 of 14, for detailed calculations).

Also, since the PM-10 emissions exiting a baghouse are no longer considered to be less than or equal to the PM emissions, the emission calculations have been revised such that the controlled PM-10 emissions from the aggregate dryer are calculated using the PM-10 emission factor from U.S. EPA's AP-42, Section 11.1, Table 11.1-5 for an oil fired drum mix dryer controlled by a fabric filter. Based on this, the controlled PM-10 emissions from the aggregate dryer are greater than controlled PM emissions. However, the controlled PM-10 emissions are still less than the allowable PM-10 emissions pursuant to 326 IAC 2-8-4, so the source is still in compliance.

Comment #18

It appears something is missing in the paragraph under the State Rule Applicability - Entire Source section of the TSD discussing the applicability of 326 IAC 2-8-4 (FESOP). It reads: "Pursuant to this rule, the usage of natural gas and natural gas equivalents for the 123.0 MMBtu per hour burner for the aggregate dryer shall be limited to 352.9 million (MM) cubic feet per 365 day period, rolled on a daily basis, so that NOx emissions are limited below 100 tons per year. The same words as underlined above need to be put into the next sentence between "equivalents shall," so one does not get the idea that 352.9 million (MM) cubic feet per 365 day period or 1,693,000 U.S. gallons per 365 day period are limits for the entire source including the insignificants. The amount of asphalt binder should be changed to amount of diluent to be current with IDEM, OAM, written in-house, FESOPs for asphalt plants. Our calculations as per IDEM, OAM, written in-house, FESOPs for asphalt plants show 14.13 pounds per hour should be the limited PM-10 emissions from the aggregate dryer, and to date we have not seen PM-10 referred to in 40 CFR 60.90, Subpart I. The source will comply with the PM-10 emission limit by utilizing a baghouse for controlling PM-10 emissions to 14.13 pounds per hour or less from the aggregate dryer as demonstrated by stack test. Therefore, the requirements of 326 IAC 2-7 do not apply. We would ask that these additions be made and the limits be updated to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #18

See the revised paragraph of the State Rule Applicability - Entire Source section of the TSD discussing the applicability of 326 IAC 2-8-4 in Response #9 on page 8 above.

Comment #19

As we have reviewed current IDEM, OAM written in-house FESOPs for asphalt plants we see the word except in the paragraph for 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving) in the State Rule Applicability - Individual Facilities section of the TSD underlined because stockpile storage needs to be taken into consideration, and therefore, there is no limit on the % of oil distillate in the stockpile mix. Further stockpile mix can be manufactured anytime during the year as per 326 IAC 8-5-2. We would ask that the addition of the underline be made, and statements relative to this rule be updated to conform with current IDEM, OAM written in-house FESOPs for asphalt plants.

Response #19

Since the source uses liquid asphalt to manufacture stockpile mix for stockpile storage, there is no limit on the percent of oil distillate in the liquid asphalt used. They can also manufacture stockpile mix anytime during the year. To clarify this, the paragraph for 326 IAC 8-5-2 in the State Rule Applicability - Individual Facilities section of the TSD, now reads as follows (changes in bold or strikeout):

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

No person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion for any paving application **except** the following purposes:

1) penetrating prime coating
2) stockpile storage
3) application during the months of November, December, January, February and March.

This source uses ~~gelled asphalt~~ **liquid asphalt binder** to manufacture stockpile mix~~ on a limited basis~~ for stockpile storage**, therefore, there is no limit on the % of oil distillate in the liquid asphalt used**. ~~The gelled asphalt contains a maximum of 1% oil distillate by volume. It is only manufactured during late November or early December and/or late March or early April and is in compliance with 326 IAC 8-5-2.~~ **The source is in compliance with 326 IAC 8-5-2.**

Comment #20

In item 1(b) of the Compliance Requirements section of the TSD, we would ask that the words following "...equivalents for the entire source" be replaced with the words in item 1(a) in the aggregate dryer burner, so that no one gets the idea that the insignificants are included with this limit.

Response #20

Item 1(b) of the Compliance Requirements section of the TSD now reads as follows:

(b) the consumption of re-refined waste oil and its equivalents ~~for the entire source~~ **in the aggregate dryer burner** must be limited to 1,693,000 U.S. gallons per 365 day period, rolled on a daily basis, based on a maximum sulfur content of 0.75% for re-refined waste oil and a maximum sulfur content of 0.5% for No. 2 distillate fuel oil, in order to ensure compliance with 326 IAC 2-8 (FESOP).

Comment #21

Please update the emission calculations on page 4 of 14 of Appendix A for aggregate drying to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #21

The PM, PM-10, and VOC emission calculations as shown use AP-42 emission factors to calculate emissions from aggregate drying. The VOC emission calculations represent total HAP emissions from aggregate drying using AP-42 factors. All HAP emissions, including metallic HAP emissions, from aggregate drying are shown in detail on page 12 and 13 of 14 of Appendix A. Besides stack test data, AP-42 emission factors are the preferred emission factors to use for emission calculations. Therefore, these emission calculations will remain unchanged.

Comment #22

Please update the conveying/handling emission calculations on page 4 of 14 of Appendix A to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #22

See Response #15 on page 11 above for a discussion on the revised conveying/handling emission calculations. These calculations have been updated using current IDEM, OAM calculation procedures for conveying/handling emissions from asphalt plants.

Comment #23

Please update the emission calculations for VOC emissions from cold mix asphalt production and the parameter being limited (diluent) to conform with current IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #23

See Response #9 on page 8 above for a discussion on the revised VOC emission calculations from cold mix asphalt production.

Comment #24

We erroneously listed the baghouse control efficiency as 99.872% instead of 99.852%. Please update the emission calculations to show the correct control efficiency.

Response #24

The PM and PM-10 emission calculations have been updated based on a revised control efficiency of 99.852%. None of the operating conditions in the FESOP have been changed as a result of this correction.

Comment #25

In the VOC emission calculations for aggregate drying, we have noted in current IDEM, OAM, written in-house FESOPs for asphalt plants that HAPs are not added to the aggregate dryer fuel VOCs and the Limited Potential to Emit.

We would ask that these emission calculations be updated to conform with IDEM, OAM, written in-house FESOPs for asphalt plants.

Response #25

The HAP emissions from aggregate drying, calculated using emission factors from U.S. EPA's AP-42, section 11.1, represent emissions from the liquid asphalt cement as well as from combustion exhaust gases. Therefore, to provide the worst case VOC emissions, these HAP emissions are added to the VOC emissions from combustion calculated using emission factors from U.S. EPA's AP-42 section 1.3, 1.4, and 1.11. Therefore, the VOC emission calculations for aggregate drying will remain unchanged.

Company Name:	Milestone Contractors, L.P.
Plant Location:	7012 South County Rd. 750E, Plainfield, Indiana 46168
County:	Hendricks
Date Received:	April 2, 1998
Permit Reviewer:	Trish Earls

**** aggregate dryer burner****

The following calculations determine the amount of emissions created by natural gas combustion, from the aggregate dryer burner, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, and 1.4-3.

Criteria Pollutant: 123 MMBtu/hr * 8,760 hr/yr / 1000 Btu/cf * 2,000 lb/ton * Ef (lb/MMcf) = (ton/yr)

P M:	5.0	lb/MMcf =	**2.69**	**ton/yr**
P M-10:	5.0	lb/MMcf =	**2.69**	**ton/yr**
S O 2:	0.6	lb/MMcf =	**0.32**	**ton/yr**
N O x:	550.0	lb/MMcf =	**296.31**	**ton/yr**
V O C:	1.4	lb/MMcf =	**0.75**	**ton/yr**
C O:	40.0	lb/MMcf =	**21.55**	**ton/yr**

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ 0.50 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-5.

Criteria Pollutant: 123 MMBtu/hr * 8,760 hr/yr / 140,000 Btu/gal * 2,000 lb/ton * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0	lb/1000 gal =	**7.70**	**ton/yr**
P M-10:	1.0	lb/1000 gal =	**3.85**	**ton/yr**
S O 2:	71.0	lb/1000 gal =	**273.22**	**ton/yr**
N O x:	20.0	lb/1000 gal =	**76.96**	**ton/yr**
V O C:	0.20	lb/1000 gal =	**0.77**	**ton/yr**
C O:	5.0	lb/1000 gal =	**19.24**	**ton/yr**

The following calculations determine the amount of emissions created by the combustion of re-refined waste oil @ 0.75 % sulfur, 1.020 % ash, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, and 1.11-3.

Criteria Pollutant: 123 MMBtu/hr * 8760 hr/yr / 140,000 Btu/gal * 2000 lb/ton * Ef (lb/1000 gal) = (ton/yr)

P M:	62.2	lb/1000 gal =	**239.43**	**ton/yr**
P M-10:	52.0	lb/1000 gal =	**200.18**	**ton/yr**
S O 2:	110.3	lb/1000 gal =	**424.26**	**ton/yr**
N O x:	19.0	lb/1000 gal =	**73.11**	**ton/yr**
V O C:	1.0	lb/1000 gal =	**3.85**	**ton/yr**
C O:	5.0	lb/1000 gal =	**19.24**	**ton/yr**

The maximum potential emissions from the aggregate dryer burner due to fuel combustion are the following:

Criteria Pollutant:			**Worst Case Fuel**
P M:	**239.43**	**ton/yr**	Re-refined Waste Oil
P M-10:	**200.18**	**ton/yr**	Re-refined Waste Oil
S O 2:	**424.26**	**ton/yr**	Re-refined Waste Oil
N O x:	**296.31**	**ton/yr**	Natural Gas
V O C:	**3.85**	**ton/yr**	Re-refined Waste Oil
C O:	**21.55**	**ton/yr**	Natural Gas

****hot oil heater****

The following calculations determine the amount of emissions created by natural gas combustion, from the hot oil heater, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, and 1.4-3.

Criteria Pollutant:

$$\frac{2.2 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{1000 \text{ Btu/cf} * 2{,}000 \text{ lb/ton}} * \text{Ef (lb/MMcf)} = \text{(ton/yr)}$$

P M:	11.9	lb/MMcf =	**0.11**	**ton/yr**
P M-10:	11.9	lb/MMcf =	**0.11**	**ton/yr**
S O 2:	0.6	lb/MMcf =	**0.01**	**ton/yr**
N O x:	100.0	lb/MMcf =	**0.96**	**ton/yr**
V O C:	5.8	lb/MMcf =	**0.06**	**ton/yr**
C O:	21.0	lb/MMcf =	**0.20**	**ton/yr**

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ 0.50 % sulfur, from hot oil heater, based on 8760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-2, and 1.3-6.

Criteria Pollutant:

$$\frac{2.2 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{140{,}000 \text{ Btu/gal} * 2{,}000 \text{ lb/ton}} * \text{Ef (lb/1,000 gal)} = \text{(ton/yr)}$$

P M:	2.0	lb/1000 gal =	**0.14**	**ton/yr**
P M-10:	1.1	lb/1000 gal =	**0.07**	**ton/yr**
S O 2:	71.0	lb/1000 gal =	**4.89**	**ton/yr**
N O x:	20.0	lb/1000 gal =	**1.38**	**ton/yr**
V O C:	0.34	lb/1000 gal =	**0.02**	**ton/yr**
C O:	5.0	lb/1000 gal =	**0.34**	**ton/yr**

The maximum potential emissions from the hot oil heater due to fuel combustion are the following:

Criteria Pollutant:			**Worst Case Fuel**
P M:	**0.14**	**ton/yr**	Distillate Oil
P M-10:	**0.11**	**ton/yr**	Natural Gas
S O 2:	**4.89**	**ton/yr**	Distillate Oil
N O x:	**1.38**	**ton/yr**	Distillate Oil
V O C:	**0.06**	**ton/yr**	Natural Gas
C O:	**0.34**	**ton/yr**	Distillate Oil

****insignificant combustion sources****

Insignificant combustion units at this source include one (1) natural gas fired 0.06 MMBtu/hr shop heater, one (1) propane fired 0.5 MMBtu/hr hand torch, and one (1) No. 2 fuel oil fired 0.35 MMBtu/hr space heater.

The following calculations determine the amount of emissions created by natural gas combustion, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, and 1.4-3.

Criteria Pollutant:

0.06 MMBtu/hr * 8,760 hr/yr * Ef (lb/MMcf) = (ton/yr)
1000 Btu/cf * 2,000 lb/ton

P M:	11.2 lb/MMcf =	**0.00**	**ton/yr**
P M-10:	11.2 lb/MMcf =	**0.00**	**ton/yr**
S O 2:	0.6 lb/MMcf =	**0.00**	**ton/yr**
N O x:	94.0 lb/MMcf =	**0.02**	**ton/yr**
V O C:	11.0 lb/MMcf =	**0.00**	**ton/yr**
C O:	40.0 lb/MMcf =	**0.01**	**ton/yr**

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ 0.50 % sulfur, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-2, 1.3-4, and 1.3-8.

Criteria Pollutant:

0.35 MMBtu/hr * 8,760 hr/yr * Ef (lb/1,000 gal) = (ton/yr)
140,000 Btu/gal * 2,000 lb/ton

P M:	2.0 lb/1000 gal =	**0.02**	**ton/yr**
P M-10:	1.1 lb/1000 gal =	**0.01**	**ton/yr**
S O 2:	71.0 lb/1000 gal =	**0.78**	**ton/yr**
N O x:	20.0 lb/1000 gal =	**0.22**	**ton/yr**
V O C:	0.34 lb/1000 gal =	**0.00**	**ton/yr**
C O:	5.0 lb/1000 gal =	**0.05**	**ton/yr**

The following calculations determine the amount of emissions created by propane combustion, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.5 - Liquefied Petroleum Gas Combustion, Table 1.5-1.

Criteria Pollutant:

0.5 MMBtu/hr * 8,760 hr/yr * Ef (lb/1000 gal) = (ton/yr)
91.5 MMBtu/1000 gal * 2,000 lb/ton

P M:	0.4 lb/1000 gal =	**0.01**	**ton/yr**
P M-10:	0.4 lb/1000 gal =	**0.01**	**ton/yr**
S O 2:	0.0 lb/1000 gal =	**0.00**	**ton/yr**
N O x:	14.0 lb/1000 gal =	**0.34**	**ton/yr**
V O C:	0.5 lb/1000 gal =	**0.01**	**ton/yr**
C O:	1.9 lb/1000 gal =	**0.05**	**ton/yr**

The maximum potential emissions of the insignificant combustion sources are the following:

Criteria Pollutant:

P M:	**0.03**	**ton/yr**
P M-10:	**0.02**	**ton/yr**
S O 2:	**0.78**	**ton/yr**
N O x:	**0.58**	**ton/yr**
V O C:	**0.02**	**ton/yr**
C O:	**0.11**	**ton/yr**

*** * aggregate drying: drum-mix plant * ***

The following calculations determine the amount of worst case emissions created by aggregate drying before controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Tables 11.1-5 and 11.1-10 for a drum mix dryer which has the capability of combusting either fuel oil or natural gas:

Pollutant: Ef lb/ton x 400 ton/hr x 8,760 hr/yr
2,000 lb/ton

Criteria Pollutant:

P M:	19	lb/ton =	**33,288.00**	**ton/yr**
P M-10:	4.4	lb/ton =	**7,708.80**	**ton/yr**
VOC:	0.006317	lb/ton =	**11.07**	**ton/yr**

The VOC emission factor for aggregate drying includes HAP emissions which are assumed to be VOC.

*** * conveying / handling * ***

The following calculations determine the amount of emissions created by material handling, based on 8.760 hours of use and AP-42, Section 13.2.4, Equation 1. The emission factor for calculating PM emissions is calculated as follows:

PM-10 Emissions:

E = k*(0.0032)*(((U/5)^1.3)/((M/2)^1.4))
= 1.12E-03 lb PM-10/ton
2.37E-03 lb PM/ton
where k = 0.35 (particle size multiplier for <10um)
0.74 (particle size multiplier for <30um)
U = 12 mph mean wind speed
M = 4.5 material moisture content (%)

400 ton/hr * 8,760 hrs/yr * Ef (lb/ton of material) = (ton/yr)
2,000 lb/ton

Total PM 10 Emissions: 1.97 tons/yr
Total PM Emissions: 4.16 tons/yr

*** * unpaved roads * ***

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and AP-42, Ch 11.2.1.

I. Tri-Axle Dump Trucks
16.11 trip/hr x
0.076 mile/trip x
2 (round trip) x
8,760 hr/yr = 21450.7872 miles per year

Ef = k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)
= 3.27 lb/mile
where k = 0.8 (particle size multiplier)
s = 4.8 % silt content of unpaved roads
p = 125 days of rain greater than or equal to 0.01 inches
S = 10 miles/hr vehicle speed
W = 24 tons average vehicle weight
w = 14 wheels

PM: 3.27 lb/mi x 21450.787 mi/yr = 35.08 tons/yr
2000 lb/ton

P M-10: 35% of PM = 12.28 tons/yr

*** * unpaved roads * ***

II. Semi Dump Truck

1.5	trip/hr x	
0.076	mile/trip x	
2	(round trip) x	
8,760	hr/yr =	1997.28 miles per year

Ef =	k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)	
=	3.90	lb/mile
where k =	0.8	(particle size multiplier)
s =	4.8	% silt content of unpaved roads
p =	125	days of rain greater than or equal to 0.01 inches
S =	10	miles/hr vehicle speed
W =	25	tons average vehicle weight
w =	18	wheels

PM: $\frac{3.90 \text{ lb/mi} \times 1997.28 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ 3.90 tons/yr

P M-10: 35% of PM = 1.36 tons/yr

III. Tri-Axle Dump Trucks

3.16	trip/hr x	
0.02	mile/trip x	
2	(round trip) x	
8,760	hr/yr =	1107.264 miles per year

Ef =	k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)	
=	3.27	lb/mile
where k =	0.8	(particle size multiplier)
s =	4.8	% silt content of unpaved roads
p =	125	days of rain greater than or equal to 0.01 inches
S =	10	miles/hr vehicle speed
W =	24	tons average vehicle weight
w =	14	wheels

PM: $\frac{3.27 \text{ lb/mi} \times 1107.264 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ 1.81 tons/yr

P M-10: 35% of PM = 0.63 tons/yr

*** * unpaved roads * ***

IV. Semi Tank Trucks

0.8	trip/hr x	
0.023	mile/trip x	
2	(round trip) x	
8,760	hr/yr =	322.368 miles per year

Ef =	k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)	
=	4.14	lb/mile
where k =	0.8	(particle size multiplier)
s =	4.8	% silt content of unpaved roads
p =	125	days of rain greater than or equal to 0.01 inches
S =	10	miles/hr vehicle speed
W =	28	tons average vehicle weight
w =	18	wheels

PM: 4.14 lb/mi x 322.368 mi/yr = / 2000 lb/ton = 0.67 tons/yr

P M-10: 35% of PM = 0.23 tons/yr

V. Front End Loader

30.52	trip/hr x	
0.062	mile/trip x	
2	(round trip) x	
8,760	hr/yr =	33152.0448 miles per year

Ef =	k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)	
=	3.10	lb/mile
where k =	0.8	(particle size multiplier)
s =	4.8	% silt content of unpaved roads
p =	125	days of rain greater than or equal to 0.01 inches
S =	10	miles/hr vehicle speed
W =	53	tons average vehicle weight
w =	4	wheels

PM: 3.10 lb/mi x 33152.045 mi/yr = / 2000 lb/ton = 51.45 tons/yr

P M-10: 35% of PM = 18.01 tons/yr

*** * unpaved roads * ***

VI. Front End Loader

5.39 trip/hr x
0.071 mile/trip x
2 (round trip) x
8,760 hr/yr = 6704.7288 miles per year

Ef = k*5.9*(s/12)*(S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)
= 3.10 lb/mile
where k = 0.8 (particle size multiplier)
s = 4.8 % silt content of unpaved roads
p = 125 days of rain greater than or equal to 0.01 inches
S = 10 miles/hr vehicle speed
W = 53 tons average vehicle weight
w = 4 wheels

PM: 3.10 lb/mi x 6704.7288 mi/yr = / 2000 lb/ton = 10.41 tons/yr

P M-10: 35% of PM = 3.64 tons/yr

Total PM Emissions From Unpaved Roads = 103.31 tons/yr

Total PM-10 Emissions From Unpaved Roads = 36.16 tons/yr

*** * storage * ***

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

Material	Silt Content (wt %)	Pile Size (acres)	Storage Capacity (tons)	PM Emissions tons/yr	PM-10 Emisions tons/yr
Sand	1.2	1.004	26,241	0.25	0.09
Stone	1.1	1.172	30,631	0.27	0.10
Slag	0.9	0.402	10,507	0.08	0.03
RAP	0.2	1.020	26,659	0.04	0.02
Total				**0.65**	**0.23**

Sample Calculation:

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
= 1.39 lb/acre/day
where s = 1.2 % silt
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Ep (storage) = Ef * sc * (20 cuft/ton) * (365 day/yr) / (2,000 lb/ton)*(43,560 sqft/acre)*(12 ft)
where sc = 26,241 tons storage capacity

PM = 0.25 tons/yr P M-10: 35% of PM = 0.09 tons/yr

*** *cold mix VOC storage emissions * ***

The following calculations determine the amount of VOC emissions created by the application of cutback asphalt with a typical value of 35% by volume of diluent, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 4.5, Table 4.5

VOC Emission Factor =	1.7%	weight percent flash-off of cold mix
Potential Throughput (tons/yr) =	3,504,000	tons/yr stockpile mix

Potential VOC Emissions (tons/yr) = Potential Throughput (tons/yr) * wt percent flash-off

Potential VOC Emissions = 58,867.20 tons/yr

* Weight percent flash-off is based on a 7.0 percent by weight of cutback asphalt, containing 35% by volume of diluent of which 95% volatilizes, in stockpile mix and 24% by weight of cutback asphalt evaporated (from Table 4.5-1).

*** * summary of source emissions before controls * ***

Criteria Pollutants:

P M:	**33,635.72**	**ton/yr**	
P M-10:	**7,947.47**	**ton/yr**	
S O 2:	**429.92**	**ton/yr**	
N O x:	**298.26**	**ton/yr**	
V O C:	**58,882.19**	**ton/yr**	(VOCs include HAPs from aggregate drying operation)
C O:	**22.00**	**ton/yr**	

*** * source emissions after controls * ***

In order to qualify for the FESOP program, this facility must limit PM-10, SO2, NOx, and VOC emissions to 99.0 tons per year. Consequently, SO2 emissions from the aggregate dryer must be limited to 93.33 tons per year (99.0 ton/yr - 5.67 ton/yr from the other combustion sources). The NOx emissions from the aggregate dryer must be limited to 97.04 ton/yr (99.0 ton/yr - 1.96 ton/yr from the miscellaneous combustion sources).

* Emissions of PM and PM-10 from aggregate drying operations are controlled with a 99.852 % control efficiency.

The following calculations determine the amount of emissions created by natural gas combustion based on a fuel usage limitation of 352,872,727 cf

Natural Gas: 352.873 MMcf/yr / 2,000 lb/ton * Ef (lb/MMcf) = (ton/yr)

P M:	5.0	lb/MMcf =	**1.31E-03**	**ton/yr ***
P M-10:	5.0	lb/MMcf =	**1.31E-03**	**ton/yr ***
S O 2:	0.6	lb/MMcf =	**0.11**	**ton/yr**
N O x:	550.0	lb/MMcf =	**97.04**	**ton/yr**
V O C:	1.4	lb/MMcf =	**0.25**	**ton/yr**
C O:	40.0	lb/MMcf =	**7.06**	**ton/yr**

The following calculations determine the amount of emissions created by No.2 distillate fuel oil @ 0.50 % sulfur based on a fuel usage limitation of 2,629,014 gal/yr:

No. 2 Distillate Oil: 2,629,014 gal/yr / 2,000 lb/ton * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0	lb/1000 gal =	**3.89E-03**	**ton/yr ***
P M-10:	1.0	lb/1000 gal =	**1.95E-03**	**ton/yr ***
S O 2:	71.0	lb/1000 gal =	**93.33**	**ton/yr**
N O x:	20.0	lb/1000 gal =	**26.29**	**ton/yr**
V O C:	0.20	lb/1000 gal =	**0.26**	**ton/yr**
C O:	5.0	lb/1000 gal =	**6.57**	**ton/yr**

The following calculations determine the amount of emissions created by waste oil @ 0.75 % sulfur based on a fuel usage limitation of 1,693,061 gal/yr:

Waste Oil: 1,693,061 gal/yr / 2000 lb/ton * Ef (lb/1000 gal) = (ton/yr)

P M:	62.2	lb/1000 gal =	**0.08**	**ton/yr ***
P M-10:	52.0	lb/1000 gal =	**0.07**	**ton/yr ***
S O 2:	110.3	lb/1000 gal =	**93.33**	**ton/yr**
N O x:	19.0	lb/1000 gal =	**16.08**	**ton/yr**
V O C:	1.0	lb/1000 gal =	**0.85**	**ton/yr**
C O:	5.0	lb/1000 gal =	**4.23**	**ton/yr**

Criteria Pollutant:

			Worst Case Fuel
P M:	**0.08**	**ton/yr ***	Re-refined Waste Oil
P M-10:	**0.07**	**ton/yr ***	Re-refined Waste Oil
S O 2:	**93.33**	**ton/yr**	Distillate/Re-refined Waste Oil
N O x:	**97.04**	**ton/yr**	Natural Gas
V O C:	**0.85**	**ton/yr**	Re-refined Waste Oil
C O:	**7.06**	**ton/yr**	Natural Gas

Primary Fuel Usage Limitations

Natural Gas:

97.04	tons NOx/year limited	*	1077.48	MMCF	=	352.87	MMCF
296.307	tons NOx/year potential			year potential			year limited

Secondary Fuel Usage Limitations

Fuel Oil: re-refined waste oil

93.33	tons SO2/year limited	*	7696.29	Kgals	=	1693.06	Kgals
424.26	tons SO2/year potential			year potential			year limited

Fuel Oil: #2 distillate fuel oil

93.33	tons SO2/year limited	*	7696.29	Kgals	=	2629.01	Kgals
273.22	tons SO2/year potential			year potential			year limited

Primary fuel equivalence limit for re-refined waste oil based on NOx emissions from natural gas

73.11	W.O. potential emissions (ton/yr)	/	296.31	n.g. potential emissions (ton/yr)
7696.29	W.O. potential usage (kgal/yr)		1077.48	n.g. potential usage (MMCF/yr)

= 0.0345 MMCF n.g. burned / Kgal W.O. burned

Primary fuel equivalence limit for #2 distillate fuel oil based on NOx emissions from natural gas

76.96	#2 F.O. potential emissions (ton/yr)	/	296.31	n.g. potential emissions (ton/yr)
7696.29	#2 F.O. potential usage (kgal/yr)		1077.48	n.g. potential usage (MMCF/yr)

= 0.0364 MMCF n.g. burned / Kgal #2 F.O. burned

Secondary fuel equivalence limit for natural gas based on SO2 emissions from re-refined waste oil

0.32	n.g. potential emissions (ton/yr)	/	424.26	W.O. potential emissions (ton/yr)
1077.48	n.g. potential usage (MMCF/yr)		7696.29	W.O. potential usage (kgal/yr)

= 0.0054 Kgal W.O. burned / MMCF n.g. burned

Secondary fuel equivalence limit for #2 distillate fuel oil based on SO2 emissions from re-refined waste oil

273.22	#2 F.O. potential emissions (ton/yr)	/	424.26	W.O. potential emissions (ton/yr)
7696.29	#2 F.O. potential usage (kgal/yr)		7696.29	W.O. potential usage (kgal/yr)

= 0.6440 Kgal W.O. burned / Kgal #2 F.O. burned

*** * source emissions after controls * ***

	misc. combustion:		nonfugitive			
P M:	0.17	ton/yr x	100.00%	emitted after controls =	**0.17**	**ton/yr**
P M-10:	0.14	ton/yr x	100.00%	emitted after controls =	**0.14**	**ton/yr**
	aggregate drying:		nonfugitive			
P M:	33,288.00	ton/yr x	0.15%	emitted after controls =	**49.27**	**ton/yr**
P M-10:	7,708.80	ton/yr x	0.70%	emitted after controls =	**54.31**	**ton/yr***
VOC:	11.07	ton/yr x	100.00%	emitted after controls =	**11.07**	**ton/yr**
	conveying/handling:		fugitive			
P M:	4.16	ton/yr x	50%	emitted after controls =	**2.08**	**ton/yr**
P M-10:	1.97	ton/yr x	50%	emitted after controls =	**0.98**	**ton/yr**
	unpaved roads:		fugitive			
P M:	103.31	ton/yr x	50%	emitted after controls =	**51.66**	**ton/yr**
P M-10:	36.16	ton/yr x	50%	emitted after controls =	**18.08**	**ton/yr**
	storage piles:		fugitive			
P M:	0.65	ton/yr x	50%	emitted after controls =	**0.32**	**ton/yr**
P M-10:	0.23	ton/yr x	50%	emitted after controls =	**0.11**	**ton/yr**
	cold mix VOC storage:		fugitive			
VOC:	58,867.20	ton/yr x	91.59	Limited Diluent Throughput (tons/yr)	**87.01**	**ton/yr**

*Note: Controlled PM-10 emissions from aggregate drying are calculated based on emission factors from US EPA's AP-42, Section 11.1, Table 11.1-5 for an oil fired drum mix dryer with a fabric filter for control. Based on differences in the testing methods for PM and PM-10, the controlled PM-10 is greater than the controlled PM emissions because it includes the condensible portions in addition to filterable PM-10.

*** * summary of source emissions after controls * ***

Criteria Pollutant:	**Non-Fugitive**	**Fugitive**	**Total**
PM:	**49.52 ton/yr**	**54.06 ton/yr**	**103.58 ton/yr**
PM-10:	**54.51 ton/yr**	**19.18 ton/yr**	**73.69 ton/yr**
S O 2:	**98.99 ton/yr**	**0.00 ton/yr**	**98.99 ton/yr**
N O x:	**99.00 ton/yr**	**0.00 ton/yr**	**99.00 ton/yr**
V O C:	**11.99 ton/yr**	**87.01 ton/yr**	**99.00 ton/yr**
C O:	**7.51 ton/yr**	**0.00 ton/yr**	**7.51 ton/yr**

Hazardous Air Pollutants (HAPs)

**** aggregate dryer burner****

The following calculations determine the amount of HAP emissions created by the combustion of distillate fuel oil before & after controls @ 0.50 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Table 1.3-11.

Hazardous Air Pollutants (HAPs): 123 MMBtu/hr * 8760 hr/yr / 2,000 lb/ton * Ef (lb/10^12 Btu) = (ton/yr)

			Potential To Emit	Limited Emissions
Arsenic:	4.2	lb/10^12 Btu =	2.26E-03 ton/yr	3.35E-06 ton/yr
Beryllium:	2.5	lb/10^12 Btu =	1.35E-03 ton/yr	1.99E-06 ton/yr
Cadmium:	11	lb/10^12 Btu =	5.93E-03 ton/yr	8.77E-06 ton/yr
Chromium:	67	lb/10^12 Btu =	3.61E-02 ton/yr	5.34E-05 ton/yr
Lead:	8.9	lb/10^12 Btu =	4.79E-03 ton/yr	7.10E-06 ton/yr
Manganese:	14	lb/10^12 Btu =	7.54E-03 ton/yr	1.12E-05 ton/yr
Mercury:	3	lb/10^12 Btu =	1.62E-03 ton/yr	2.39E-06 ton/yr
Nickel:	18	lb/10^12 Btu =	9.70E-03 ton/yr	1.44E-05 ton/yr
		Total HAPs =	6.93E-02 ton/yr	1.03E-04 ton/yr

The following calculations determine the amount of emissions created by re-refined waste oil combustion, from asphalt heating, @ 0.0072 % lead, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, 1.11-3, and 1.11-4.

Hazardous Air Pollutants (HAPs): 123 MMBtu/hr * 8760 hr/yr / 140,000 Btu/gal * 2000 lb/ton * 1000 gal/kgal * Ef (lb/1000 gal) = (ton/yr)

			Potential To Emit	Limited Emissions
Lead:	0.396	lb/1000 gal =	1.52 ton/yr	2.26E-03 ton/yr
Arsenic:	0.11	lb/1000 gal =	0.42 ton/yr	6.26E-04 ton/yr
Cadmium:	0.0093	lb/1000 gal =	0.04 ton/yr	5.30E-05 ton/yr
Chromium:	0.02	lb/1000 gal =	0.08 ton/yr	1.14E-04 ton/yr
Cobalt:	0.00021	lb/1000 gal =	0.00 ton/yr	1.20E-06 ton/yr
Manganese:	0.068	lb/1000 gal =	0.26 ton/yr	3.87E-04 ton/yr
Nickel:	0.011	lb/1000 gal =	0.04 ton/yr	6.26E-05 ton/yr
		Total HAPs =	2.36 ton/yr	3.50E-03 ton/yr

*** * aggregate drying: drum-mix plant * ***

The following calculations determine the amount of HAP emissions created by aggregate drying before & after controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Table 11.1-10 for a drum mix dryer which can be fired with either fuel oil or natural gas. The HAP emission factors represent the worst case emissions (fuel oil combustion).

Pollutant: Ef lb/ton x 400 / 2000 lb/ton x ton/hr x 8760 hr/yr

Hazardous Air Pollutants (HAPs):			Potential To Emit	Limited Emissions
Acetaldehyde:	1.30E-03	lb/ton =	2.28 ton/yr	2.28 ton/yr
Acrolein:	2.60E-05	lb/ton =	0.05 ton/yr	0.05 ton/yr
Benzene:	4.10E-04	lb/ton =	0.72 ton/yr	0.72 ton/yr
Ethylbenzene:	3.80E-04	lb/ton =	0.67 ton/yr	0.67 ton/yr
***Formaldehyde:**	2.40E-03	lb/ton =	4.20 ton/yr	4.20 ton/yr
Methyl Ethyl Ketone:	2.00E-05	lb/ton =	0.04 ton/yr	0.04 ton/yr
Propionaldehyde:	1.30E-04	lb/ton =	0.23 ton/yr	0.23 ton/yr
Quinone:	1.60E-04	lb/ton =	0.28 ton/yr	0.28 ton/yr
Toluene:	7.50E-04	lb/ton =	1.31 ton/yr	1.31 ton/yr
****Total Polycyclic Organic Matter (POM):**	5.810E-04	lb/ton =	1.02 ton/yr	1.02 ton/yr
Xylene:	1.60E-04	lb/ton =	0.28 ton/yr	0.28 ton/yr
		Total HAPs =	11.07 ton/yr	11.07 ton/yr

* The emission factors for benzene, formaldehyde, and xylene from natural gas firing (0.0012 lb/ton, 0.0036 lb/ton, and 0.0004 lb/ton, respectively) exceed the benzene, formaldehyde, and xylene emission factors for fuel oil firing (0.00041 lb/ton, 0.0024 lb/ton, and 0.00016 lb/ton, respectively). Consequently, the worst case emissions for benzene, formaldehyde, and xylene are 1.58 ton/yr, 4.73 ton/yr, and 0.53 ton/yr, respectively. However, since the VOC emissions from fuel oil combustion exceed the VOC emissions from natural gas firing, the fuel oil emission factors were used to avoid overestimating total VOC emissions.

** total POM includes 2-Methylnapthalene, Acenaphthylene, Anthracene, Fluorene, Naphthalene, Phenanthrene, and Pyrene.

*** * summary of source HAP emissions potential to emit * ***

Hazardous Air Pollutants (HAPs):

Acetaldehyde:	**2.278**	ton/yr
Acrolein:	**0.046**	ton/yr
Arsenic:	**0.423**	ton/yr
Benzene:	**0.718**	ton/yr
Beryllium:	**0.001**	ton/yr
Cadmium:	**0.036**	ton/yr
Chromium:	**0.077**	ton/yr
Ethylbenzene:	**0.666**	ton/yr
Formaldehyde:	**4.205**	ton/yr
Lead:	**1.524**	ton/yr
Manganese:	**0.262**	ton/yr
Mercury:	**0.002**	ton/yr
Methyl Ethyl Ketone:	**0.035**	ton/yr
Nickel:	**0.042**	ton/yr
Propionaldehyde:	**0.228**	ton/yr
Quinone:	**0.280**	ton/yr
Toluene:	**1.314**	ton/yr
Total POM:	**1.018**	ton/yr
Xylene:	**0.280**	ton/yr
Total:	**13.434**	**ton/yr**

*** * summary of source HAP limited emissions * ***

Hazardous Air Pollutants (HAPs):

Acetaldehyde:	**2.278**	ton/yr
Acrolein:	**0.046**	ton/yr
Arsenic:	**0.001**	ton/yr
Benzene:	**0.718**	ton/yr
Beryllium:	**0.000**	ton/yr
Cadmium:	**0.000**	ton/yr
Chromium:	**0.000**	ton/yr
Ethylbenzene:	**0.666**	ton/yr
Formaldehyde:	**4.205**	ton/yr
Lead:	**0.002**	ton/yr
Manganese:	**0.000**	ton/yr
Mercury:	**0.000**	ton/yr
Methyl Ethyl Ketone:	**0.035**	ton/yr
Nickel:	**0.000**	ton/yr
Propionaldehyde:	**0.228**	ton/yr
Quinone:	**0.280**	ton/yr
Toluene:	**1.314**	ton/yr
Total Polycyclic Organic Matter:	**1.018**	ton/yr
Xylene:	**0.280**	ton/yr
Total:	**11.071**	**ton/yr**

*** * miscellaneous * ***

326 IAC 7 Compliance Calculations:

The following calculations determine the maximum sulfur content of distillate fuel oil allowable by 326 IAC 7:

0.5	lb/MMBtu	x	140,000	Btu/gal=	70	lb/1000gal
70	lb/1000gal	/	142	lb/1000 gal =	0.5	%

Sulfur content must be less than or equal to 0.5% to comply with 326 IAC 7.

The following calculations determine the maximum sulfur content of waste (residual) oil allowable by 326 IAC 7:

1.6	lb/MMBtu	x	140,000	Btu/gal=	224	lb/1000gal
224	lb/1000gal	/	147	lb/1000 gal =	1.5	%

Sulfur content must be less than or equal to 1.5% to comply with 326 IAC 7.

326 IAC 6-3-2 Compliance Calculations:

The following calculations determine compliance with 326 IAC 6-3-2 for process weight rates in excess of 30 tons per hour:

limit = 55 * (400 ^ 0.11) - 40 = 66.31 lb/hr or
290.45 ton/yr

Since this emission limit exceeds the PSD source definition of 250 tons/yr and the Subpart I allowable emission limit of 55.7 tons per year, compliance with the PM limit pursuant to 40 CFR 60.90, Subpart I will satisfy the requirements of 326 IAC 6-3-2 and will exempt the source from the requirements of 326 IAC 2-2 (PSD).

PM-10 Emission Limit for Aggregate Dryer:

(99.0 tons PM-10/yr - 38.5 tons PM-10/yr from other souces)
= 60.5 tons PM-10/yr = 13.81 lbs/hr

PM-10 emissions from the aggregate dryer are controlled to 12.4 lbs/hr < 13.8 lbs/hr (Will comply)

40 CFR Part 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Plants) Compliance Calculations:

The following calculations determine compliance with the NSPS, which limits stack emissions from asphalt plants to 0.04 gr/dscf:

49.27	ton/yr *	2000	lb/ton *	7000	gr/lb =	0.029	gr/dscf	(will comply)
525,600	min/yr *	44,964	dscf/min					

Allowable particulate emissions under NSPS equate to 67.52 tons per year. 15.42 lbs/hr

Note:
SCFM = 65,541 acfm * (460 + 68)*(1-0.045) / (460 + 275)
= 44,964 scfm

Assumes exhaust gas temperature of 275F, exhaust gas moisture content of 4.5% and exhaust gas flow of 65,541 acfm.