

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

**Town and Country Construction, Inc.
88 West Highway 24
Kentland, Indiana 47951**

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

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

| | |
|---|--|
| Operation Permit No.: F111-5461-03242 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: December 6, 1996 |
| First Significant Modification: SMF111-9912 | Pages Affected: cover, 4, 5, 17, 20, 23 and 24 |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates a stationary hot batch-mix asphalt plant with a maximum capacity of 160 tons per hour.

Responsible Official: Hugh T. Burns
Source Address: 88 West Highway 24, Kentland, Indiana 47951
Mailing Address: 11077 West Drive, Demotte, Indiana 46310
SIC Code: 2951
County Location: Newton
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, PSD Rules;
Synthetic Minor Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Summary

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

- (a) One (1) aggregate dryer with a maximum capacity of 160 tons per hour, having a burner with a maximum heat input rate of 55 million Btu per hour, exhausting through a cyclone separator (EU12) and a scrubber (EU14) at stack SV1. The burner is fired by #2 distillate fuel oil, including natural gas and waste oil as backup fuels.

A.3 Insignificant Activities

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

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds.

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

SECTION C SOURCE OPERATION

CONDITIONS

Entire Source

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

- C.1 Overall Source Limit (326 IAC 2-8)
Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9.0 tons per 365 day period for any individual HAP or 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.
- C.2 ** THIS CONDITION HAS BEEN REMOVED **
- C.3 Opacity
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:
- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings,
 - (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.
- C.4 Open Burning
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.
- C.5 Fugitive Dust Emissions
The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.
- C.6 ** THIS CONDITION HAS BEEN REMOVED **
- C.7 Volatile Organic Compounds (VOC)
State: That pursuant to 326 IAC 8-5 the permittee shall not allow the use of cutback asphalt or asphalt emulsion containing more than 7% oil distillate by volume of emulsion, except as used for the following purposes:

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

Whenever the results of the stack test performed in conformance with Condition C.9 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAM within 30 (thirty) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.15 ** THIS CONDITION HAS BEEN REMOVED **

C.16 Monitoring Data Availability

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. Records shall be kept of the times that the equipment is not operating. 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. 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. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) One (1) aggregate dryer with a maximum capacity of 160 tons per hour, having a burner with a maximum heat input rate of 55 million Btu per hour, exhausting through a cyclone and a scrubber at stack SV1. The burner is fired by #2 distillate fuel oil and uses natural gas and waste oil as backup fuels.
- (2) One scrubber. The scrubber controls particulate matter emissions from the aggregate dryer.

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

D.1.1 Sulfur Dioxide (SO₂)

State: Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the combustion of distillate (#2) oil shall be limited to 0.5 pounds per million BTU heat input (the equivalent of 0.493% sulfur content, with a higher heating value of 140,000 BTU per gallon, and a 55 million BTU burner).

Federal: There are no federal rules (NSPS or NESHAP) that apply to these facilities.

D.1.2 Sulfur Dioxide (SO₂)

State: Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Limitations), sulfur dioxide emissions from the combustion of waste oil shall be limited to 1.6 pounds per million BTU heat input (the equivalent of 2.216% sulfur content).

Pursuant to 329 IAC 3.1-11 (Standards for the management of specific hazardous wastes and specific types of hazardous waste management facilities), the waste oil burned in the aggregate dryer burner shall meet the used oil specifications in 40 CFR 266.40(e). Therefore, 40 CFR 266 (Standards for the management of specific hazardous wastes and specific types of hazardous waste management facilities), Subpart E (used oil burned for energy recovery), does not apply.

Federal: There are no federal rules (NSPS or NESHAP) that apply to these facilities.

D.1.3 Sulfur Dioxide (SO₂)

Pursuant to 326 IAC 2-8-4(1), the total usage of distillate #2 oil shall be limited to 3,067,292.65 gallons per year, or equivalent, based on a 365 day rolling limit. This fuel usage limitation was taken voluntarily by the company and is equivalent to sulfur dioxide emissions of 98 tons year. Please note: for the purpose of determining compliance with this limit, 1.0 gallons of #2 distillate oil shall be considered equivalent to 0.43 gallons of waste oil or 104,326.5 cubic feet of natural gas.

Due to these limits, Part 70 Permit Program Rules do not apply.

D.1.4 Particulate Matter (PM)

State: Pursuant to 326 IAC 6-3-2, particulate matter emissions from the asphalt plant shall not exceed 37.2 pounds per hour. Due to this limit, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 will not apply.

Federal: This source predates the New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60.93, Subpart I) applicability rule. Therefore, Subpart I does not apply.

D.1.5 Particulate matter less than 10 microns (PM-10)

Pursuant to 326 IAC 2-8-4, emissions of particulate matter less than 10 microns from the aggregate dryer shall not exceed 15.57 pounds per hour (lb/hr) of PM-10. Compliance with this limit will satisfy 326 IAC 2-8-4. Due to this limit, Part 70 Permit Program rules do not apply.

D.1.6 Volatile Organic Compounds (VOC)

The usage of VOC for the production of cold mix cutback asphalt shall be limited to 95.3 tons per year. This is equivalent to 1520 tons of liquid binder used per year in the production of cold mix cutback asphalt based on 10% diluent present in the asphalt. Due to the above limits, the Part 70 rules (326 IAC 2-7) do not apply.

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.1.7 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

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

D.1.8 Particulate Matter

During the period between 540 days and 720 days after issuance of this permit, the Permittee shall perform PM and PM10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 202, 201a, 202, as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM10.

D.1.9 Fuel Oil Sampling and Analysis

Oil Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted. The Permittee shall analyze the oil sample to determine the sulfur content of the oil in accordance with 326 IAC 3-3-4. If a partially empty fuel tank is refilled, a new sample and analysis is required upon filling. Vendor analysis of each load delivered is acceptable, in lieu of the above, if accompanied by a certification.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Modification (SMF) to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

| | |
|--------------------------------------|--|
| Source Name: | Town and Country Construction, Inc. |
| Source Location: | 88 West Highway 24, Kentland, Indiana 47951 |
| County: | Newton |
| SIC Code: | 2951 |
| Significant Modification No.: | SMF-111-9912 |
| Permit Reviewer: | Janusz Johnson |

Town and Country Construction, Inc., was issued a Federally Enforceable State Operating Permit (FESOP No. 111-5461-03242) on December 6, 1996, for a 160 ton per hour portable asphalt plant. On June 30, 1998, the Office of Air Management (OAM) received a letter requesting that modifications be made to the FESOP to change the operation status of the plant to stationary.

Permitted Emission Units and Pollution Control Equipment

There will be no change to the permitted emission units and pollution control devices at this source as a result of the proposed significant modification to the FESOP.

New Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

There will be no change to the insignificant activities at this source as a result of the proposed significant modification to the FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the significant modification to 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 for the FESOP and additional information submitted by the applicant.

A letter requesting the significant modification for the purposes of this review was received on June 30, 1998.

Emission Calculations

There are no new emissions of regulated air pollutants associated with this change. However, the potential to emit particulate matter (PM) from the baghouse stack and particulate matter 10 microns in diameter or less (PM10) from the unpaved roads has changed due to changes in the applicability of the limiting state rules. These changes in rule applicability are further discussed in the State Rules section of this TSD and the revised PTE levels are reflected in the Limited Potential to Emit section, below.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

| Process/facility | Limited Potential to Emit (tons/year) | | | | | | |
|--------------------------|--|-------------|-----------------|-------------|------------|-----------------|------------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| aggregate dryer/burner | 163.0 | 68.2 | 98.0 | 0.3 | 3.4 | 61.3 | 4.1 |
| unpaved roads | 85.0 | 29.8 | - | - | - | - | - |
| cutback production | - | - | - | 95.3 | - | - | - |
| insignificant activities | 1.0 | 1.0 | 1.1 | 3.0 | 0.0 | 0.0 | 0.0 |
| Total Emissions | 249.0 | 99.0 | 99.1 | 98.6 | 3.4 | 61.3 | 4.1 |

County Attainment Status

The source is located in Newton County.

| Pollutant | Status |
|-----------------|------------------------------|
| TSP | attainment or unclassifiable |
| PM-10 | attainment or unclassifiable |
| SO ₂ | attainment or unclassifiable |
| NO ₂ | attainment or unclassifiable |
| Ozone | attainment or unclassifiable |
| CO | attainment or unclassifiable |
| Lead | attainment or unclassifiable |

- (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. Newton County has been designated as attainment or unclassifiable for ozone.

Portable Source

Town and Country Construction, Inc., has requested to modify the existing FESOP to exclude portability.

Federal Rule Applicability

There are no changes to the applicability of Federal Rules due to the proposed significant modification to the FESOP.

State Rule Applicability

The following changes to State Rule applicability are necessary due to the proposed significant modification to the FESOP:

326 IAC 5-1 (Visible Emissions Limitations)

Because this asphalt plant will now be located permanently in an attainment county, the average opacity limitation shall be changed from thirty percent (30%) to forty percent (40%) opacity.

Therefore, 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 6-1-2 (Particulate Limitations)

This rule no longer applies because the asphalt plant will be permanently located in an attainment county.

326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations)

This rule previously did not apply because its applicability was superceded by the applicability of 326 IAC 6-1-2. However, because 326 IAC 6-1-2 no longer applies, the process shall be limited by 326 IAC 6-3.

Therefore, pursuant to this rule no person shall operate a facility such that particulate matter is emitted in excess of the pound per hour limit calculated as follows according to part (c) of the rule:

$$\text{for "P" less than 30 tons per hour: } E = 4.10 * P^{0.67}$$

- or -

$$\text{for "P" greater than 30 tons per hour: } E = 55.0 * P^{0.11} - 40$$

where: "E" is the emission rate limit in pounds per hour, and
"P" is the process throughput in tons per hour.

Based on the maximum throughput of 160 tons per hour for the asphalt mixer/dryer, particulate matter emissions from this facility shall not exceed 47.38 pounds per hour. For the purpose of demonstrating compliance with the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, this limitation has been truncated to 37.2 pounds per hour which is equivalent to 163 tons of PM per year based on 8760 hours of operation.

326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

This rule no longer applies because the asphalt plant will be located in an attainment area and was constructed prior to the applicability date of the rule.

The PM10 pound per hour limitation in Condition D.1.5 of the FESOP has been revised because fugitive dust controls are not considered federally enforceable. Therefore, to comply with FESOP significant levels the PM10 shall be limited to 15.57 pounds per hour which is the equivalent of 68.2 tons per year specified in the limited PTE table of this TSD.

Compliance Requirements

There are no changes to the compliance monitoring or record keeping and reporting requirements for the source as a result of the proposed significant modification to the 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) Part 70 Application Form GSD-08.

There is no change in the potential to emit (PTE) hazardous air pollutants from the source as a result of the proposed significant modification to the FESOP.

Conclusion

The operation of this hot mix asphalt plant shall be subject to the conditions of the attached proposed **Significant Modification to the FESOP No. SMF-111-9912**.

Mr. Hugh T. Burns
Town and Country Construction, Inc.
11077 West Drive
Demotte, Indiana 46310

Re: SMF 111-9912
First Significant Modification to FESOP 111-5461
Plt ID 111-03242

Dear Mr. Burns:

Town and Country Construction, Inc., was issued a Federally Enforceable State Operating Permit (FESOP) on December 6, 1996, for a 160 ton per hour portable asphalt plant. On June 30, 1998, the Office of Air Management (OAM) received a letter requesting that modifications be made to the FESOP to change the operation status of the plant to stationary.

Based on the written request from Town and Country Construction, Inc., and pursuant to the provisions of 326 IAC 2-8-11 (FESOP: Permit Modification), a significant modification to this permit is hereby approved as discussed in the attached Technical Support Document and as described herein (bold emphasis added to new language):

1. The company description and location information on the cover page of the FESOP shall be revised to list the source's permanent address as follows:

Town and Country Construction, Inc.
~~Portable Plant #3242~~
88 West Highway 24
Kentland, Indiana 47951

2. The source description in item A.1 (General Information) of Section A on Page 4 of 31 of the FESOP shall be changed to designate the source as stationary and specify the source's permanent address as follows:

A.1 General Information

The Permittee owns and operates a ~~portable~~ **stationary** hot batch-mix asphalt plant with a maximum capacity of 160 tons per hour.

Responsible Official: Hugh T. Burns
Source Address: ~~portable~~ **88 West Highway 24, Kentland, Indiana
47951**

2. The first sentence in item A.2 (Emission Units and Pollution Control Summary) of Section A on Page 4 of 31 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

A.2 Emission Units and Pollution Control Summary

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

3. The first sentence in item A.3 of Section A on Page 4 of 31 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

A.3 Insignificant Activities

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

4. The first sentence in item A.4 (FESOP Applicability) of Section A on Page 5 of 31 of the FESOP shall be changed to designate the source as stationary rather than portable as follows:

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

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

5. Condition C.2 (Portable Source Relocation) on Page 17 of 31 of the FESOP shall be removed from the permit because the source will no longer be considered portable.

6. Item (a) of Condition C.3 (Opacity) on Page 17 of 31 of the FESOP shall be modified to reflect the appropriate average opacity limitation for attainment counties as follows:

- (a) visible emissions shall not exceed an average of ~~30%~~ **40%** opacity in 24 consecutive readings,

7. Condition C.6 (Fugitive Particulate Matter Emission Limitations) on Page 17 of 31 of the FESOP shall be removed from the permit because the rule no longer applies to the source.

8. Condition C.15 (Emission Reporting) on Page 20 of 31 of the FESOP shall be removed from the permit because the rule no longer applies to the source.

9. The State portion of Condition D.1.4 (Particulate Matter) on Page 23 of 31 of the FESOP shall be revised as follows replacing the 326 IAC 6-1-2 language with the appropriate limitations from 326 IAC 6-3-2 (Particulate Emissions Limitations):

D.1.4 Particulate Matter (PM)

State: ~~Pursuant to 326 IAC 6-1-2, the scrubber shall be operated at all times when the aggregate dryer is in operation, particulate matter emissions from the asphalt plant shall not exceed 0.10 grains per dry standard cubic foot, which is equivalent to 13.43 pounds per hour (lb/hr), and visible emissions from the scrubber controlling the aggregate dryer shall not exceed 30% opacity.~~

Pursuant to 326 IAC 6-3-2, particulate matter emissions from the asphalt plant shall not exceed 37.2 pounds per hour. Due to this limit, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 will not apply.

10. The particulate matter less than 10 microns in diameter (PM10) limit specified in Condition D.1.5 on Page 24 of 31 of the FESOP shall be changed to 15.57 pounds per hour based on the removal of Condition C.6 (Fugitive Particulate Matter Emission Limitations) noted in Item 7 of this letter and the OAM determination that the fugitive dust controls are not federally enforceable. This new pound per hour limitation will ensure that the PM10 PTE does not exceed 99 tons per year. The revised condition shall be as follows:

D.1.5 Particulate matter less than 10 microns (PM-10)

Pursuant to 326 IAC 2-8-4, emissions of particulate matter less than 10 microns from the aggregate dryer shall not exceed 15.57 pounds per hour (lb/hr) of PM-10. Compliance with this limit will satisfy 326 IAC 2-8-4. Due to this limit, Part 70 Permit Program rules do not apply.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM at the above address; or by phone at 317-232-8325 or 1800-451-6027 (dial "0" and ask for ext. 2-8325).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

JKJ

Attachments: TSD - 4 pages
Modified FESOP pages - 7 pages

cc: File - Newton County
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau