NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for Woodruff and Sons, Inc. in LaPorte County

MSOP No.: M777-41308-05484

The Indiana Department of Environmental Management (IDEM) has received an application from Woodruff and Sons, Inc., located at 2125 East US Highway 12, Michigan City, Indiana 46360, for a new source construction and MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Woodruff and Sons, Inc. to construct and operate a new portable concrete and asphalt crushing operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings are available at:

Michigan City Public Library
100 East 4th Street
Michigan City, Indiana 46360

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,
you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M777-41308-05484 in all correspondence.

Comments should be sent to:

Ethan Horvath
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Ethan Horvath or (317) 233-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Ethan Horvath
E-mail: Ehorvath@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm, and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Ethan Horvath of my staff at the above address.

Iryn Callium, Section Chief
Permits Branch
Office of Air Quality
New Source Construction and Minor Source Operating Permit
OFFICE OF AIR QUALITY

Woodruff and Sons, Inc.
Portable

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

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Attachment A: Fugitive Dust Control Plan
SECTION A        SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a portable concrete and asphalt crushing operation.

| Initial Source Address:       | 2125 East US Highway 12, Michigan City, Indiana 46360 |
| General Source Phone Number:  | (219) 872-8605 |
| SIC Code:                    | 1623 (Water, Sewer, Pipeline, and Communications and Power Line Construction) |
| County Location:             | LaPorte |
| Source Location Status:      | Attainment for all criteria pollutants |
| Source Status:               | Minor Source Operating Permit Program |
|                             | Minor Source, under PSD and Emission Offset Rules |
|                             | Minor Source, Section 112 of the Clean Air Act |
|                             | Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) Material Handling Operation, identified as MHO-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour of concrete and asphalt, using no controls, exhausting outdoors, and consisting of the following:

(1) One (1) Unloading Operation, identified as UO-1;

(2) Four (4) Conveyors;

(3) One (1) Feeder, identified as F-1;

(4) Four (4) Transfer Points, identified as TP-1 through TP-4; and

(5) One (1) Vibratory Shaker Screen, identified as VSS-1.

(b) One (1) Crusher, identified as C-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour of concrete and asphalt, using no controls, and exhausting outdoors.

(c) One (1) Diesel-fired Generator, identified as G-1, approved in 2019 for construction, with a maximum output rating of 470.0 HP, using no controls, and exhausting outdoors. This generator is used to power the crusher.

[This generator is considered a non-road engine.]

(d) Unpaved Roads
SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]
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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M777-41308-05484, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) The notification 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, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
If, due to circumstances beyond the Permittee’s control, the PMPs 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M777-41308-05484 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:
(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) 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, OAQ on or before the date it is due.

(c) 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 2-6.1 until IDEM, OAQ 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee’s premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.
(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4, when located in any of the following areas:

(1) Clark County, Jeffersonville Township.
(2) Dearborn County, Lawrenceburg Township.
(3) Dubois County, Bainbridge Township.
(4) Lake County, an area bounded on the north by Lake Michigan, on the west by the Indiana-Illinois state line, on the south by U.S. 30 from the state line to the intersection of I-65 to the intersection of I-94 then following I-94 to the Lake-Porter county line, and on the east by the Lake-Porter county line.
(5) Marion County, except the area of Washington Township east of Fall Creek and the area of Franklin Township south of Thompson Road and east of Five Points Road.
(6) St. Joseph County, the area north of Kern Road and east of Pine Road.
(7) Vanderburgh County, the area included in the city of Evansville and Pigeon
Township.

(8) Vigo County, the area within a five-tenths (0.5) kilometer radius circle centered at UTM Coordinates Zone 16 East four hundred sixty-four and fifty-two hundredths (464.52) kilometers North four thousand three hundred sixty-nine and twenty-one hundredths (4,369.21) kilometers.

(c) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
(1) monitoring results;
(2) review of operation and maintenance procedures and records; and/or
(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds
into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) 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, OAQ on or before the date it is due.

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Portable Source Requirement

C.18 Relocation of Portable Sources [326 IAC 2-14-4]

(a) This permit is approved for operation in all areas of Indiana, except Lake County and Porter County, because of the additional requirements for these specific counties. This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2 and Emission Offset in 326 IAC 2-3.
A request to relocate shall be submitted to IDEM, OAQ at least thirty (30) days prior to the intended date of relocation. This submittal shall include the following:

1. A list of governmental officials entitled to receive notice of application to relocate. [IC 13-15-3-1]

2. A list of adjacent landowners that the Permittee will send written notice to not more than ten (10) days after submission of the request to relocate. [IC 13-15-8]

3. The new location address of the portable source.

4. Whether or not this portable source will be relocated to another source.

5. If relocating to another source:
   (A) Name, location address, and permit number of the source this portable source is relocating to.
   (B) Whether or not the sources will be considered as one source. See Non Rule Policy (NRP) Air-005 and Air-006.

6. If the sources will be considered as one source, whether or not the source to be relocated to has received the necessary approvals from IDEM to allow the relocation.

(c) A “Relocation Site Approval” letter shall be obtained prior to relocating.

(d) A valid operation agreement consists of this document and any subsequent “Relocation Site Approval” letter specifying the current location of the portable plant.
SECTION D.1 EMISIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Material Handling Operation, identified as MHO-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour concrete and asphalt, using no controls, exhausting outdoors, and consisting of the following:

(A) One (1) Unloading Operation, identified as UO-1;

(B) Four (4) Conveyors;

(C) One (1) Feeder, identified as F-1;

(D) Four (4) Transfer Points, identified as TP-1 through TP-4; and

(E) One (1) Vibratory Shaker Screen, identified as VSS-1.

(b) One (1) Crusher, identified as C-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour of concrete and asphalt, using no controls, and exhausting outdoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

(a) All Counties of Indiana, except Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, Wayne Lake and Porter counties:

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Vibratory Shaker Screen (VSS-1) shall not exceed 51.28 pounds per hour when operating at a process weight rate of 100.0 tons per hour.

The pounds per hour limitations were calculated using the following equation:

\[ E = 55.0 P^{0.11} - 40 \]

where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

(b) Located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne:

Pursuant to 326 IAC 6.5-1-2 (a), particulate matter (PM) emissions from the following emission units shall each be limited to 0.03 grain per dry standard cubic foot of exhaust air:

(1) Unloading Operation (UO-1)

(2) Conveyors
(3) Feeder (F-1)

(4) Transfer Points (T-1 through T-4)

(5) Vibratory Shaker Screen (VSS-1)

(6) Crusher (C-1)

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

**Company Name:** Woodruff and Sons, Inc.

**Initial Address:** 2125 East US Highway 12

**City:** Michigan City, Indiana 46360

**Phone #:** (219) 872-8605

**MSOP #:** M777-41308-05484

I hereby certify that Woodruff and Sons, Inc. is:

- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Woodruff and Sons, Inc. is:

- ☐ in compliance with the requirements of MSOP M777-41308-05484.
- ☐ not in compliance with the requirements of MSOP M777-41308-05484.

I hereby certify that the source M777-41308-05484 is currently located at the following address:

- (Address)
- (City)
- (State)
- (Zip)

☐ Relocation approval for this address was granted in Relocation No. __________________________ (specify approval number)

☐ This source is currently in temporary storage (inactive/dormant) at this address. (Note: Relocation approval is not required for a temporary storage location.)

**Authorized Individual (typed):**

**Title:**

**Signature:**

**Date:**

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.
### Noncompliance:

<table>
<thead>
<tr>
<th>Noncompliance:</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td></td>
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<td></td>
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<tr>
<td></td>
</tr>
</tbody>
</table>
This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

This facility meets the applicability requirements because it has potential to emit 25 tons/year particulate matter, 25 tons/year sulfur dioxide, 25 tons/year nitrogen oxides, 25 tons/year hydrochloric acid, 25 tons/year total reduced sulfur, 25 tons/year reduced sulfur compounds, 25 tons/year fluorides, 100 tons/year carbon monoxide, 10 tons/year any single hazardous air pollutant, 25 tons/year any combination hazardous air pollutant, 1 ton/year lead or lead compounds measured as elemental lead, or is a source listed under 326 IAC 2-5.1-3(2).

Emissions from malfunctioning control equipment or process equipment caused emissions in excess of applicable limitation.

This malfunction resulted in a violation of: 326 IAC _____ or, permit condition # _____ and/or permit limit of _______________.

This incident meets the definition of "malfunction" as listed on reverse side? Y N

This malfunction is or will be longer than the one (1) hour reporting requirement? Y N

<table>
<thead>
<tr>
<th>COMPANY:</th>
<th>PHONE NO. ( )</th>
<th>LOCATION: (CITY AND COUNTY)</th>
<th>PERMIT NO.</th>
<th>AFS PLANT ID:</th>
<th>AFS POINT ID:</th>
<th>INSPI:</th>
</tr>
</thead>
</table>

DATE/TIME MALFUNCTION STARTED: _____ / _____ / 20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: __________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE: _____ / _____ / 20____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: ____________________________

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: __________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____________________________________________

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: ___________________

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: ___________________

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: ________

INTERIM CONTROL MEASURES: (IF APPLICABLE) ________________________________________

MALFUNCTION REPORTED BY: ___________________________ TITLE: ________________________

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: ___________________________ DATE: ___________ TIME: ___________
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*Essential services* are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

________________________________________________________________________
________________________________________________________________________
Affidavit of Construction

I, ____________________________________________________________, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in ____________________________ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of ____________________________ for ________________________________.

   (Title)           (Company Name)

3. By virtue of my position with ________________________________, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _______________________________________________________________________.

   (Company Name)

4. I hereby certify that Woodruff and Sons, Inc. 2125 East US Highway 12, Michigan City, Indiana 46360, completed construction of the concrete crushing operation on __________________ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 8, 2019 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M777-41308-05484, Plant ID No. 777-05484 issued on _____________________.

5. Permitee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature________________________________________

Date ________________________________

STATE OF INDIANA)

)SS

COUNTY OF ________________________

Subscribed and sworn to me, a notary public in and for ____________________________ County and State of Indiana on this __________ day of ________________, 20__, My Commission expires: _________________________.

Signature______________________________________(typed or printed)
Attachment A

FUGITIVE DUST CONTROL PLAN

Woodruff & Sons, Inc.

CONCRETE/ASHPOLT PLANT SITE FUGITIVE DUST CONTROL PLAN

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

(1) Paved roads and parking lots:
   (A) Cleaning by vacuum sweeping on an as-needed basis (monthly at a minimum).
   (B) Power brooming while wet either from rain or application of water.

(2) Unpaved roads and parking lots:
   (A) Paving with asphalt.
   (B) Treating with emulsified asphalt on an as-needed basis.
   (C) Treating with water on an as-needed basis.
   (D) Double chipping and sealing the road surface and maintaining on an as-needed basis.

(b) Fugitive particulate matter (dust) emissions from outdoor conveying of aggregates shall be controlled by the following measure:

Apply water at the feed and the intermediate point on an as-needed basis.

(c) Fugitive particulate matter (dust) emissions resulting from the transferring of aggregates shall be controlled by one or more of the following measures:

(1) Minimizing the vehicular distance between the transfer points.

(2) Enclosing the transfer points.

(3) Applying water on transfer points on an as-needed basis.

(d) Fugitive particulate matter (dust) emissions resulting from transportation of aggregate by truck, front end loader, etc., shall be controlled by one or more of the following measures:

(1) Tarping the aggregate hauling vehicles.

(2) Maintaining vehicle bodies in a condition to prevent leakage.

(3) Spraying the aggregates with water.

(5) Maintaining a 10 mile per hour speed limit in the yard.

(e) Fugitive particulate matter (dust) emissions resulting from the loading and unloading shall be controlled by one or more of the following measures:
(1) Reducing free fall distance to a minimum.

(2) Reducing the rate of discharge of the aggregate.

(3) Spraying the aggregate with water on an as-needed basis.

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

RECORDKEEPING AND REPORTING

Records of all PM inspections, site inspections, records of employee training sessions, and any other related reports shall be retained at the source.

These records will be made available, upon request, to representatives of Indiana Department of Environmental Management and any other jurisdictional authorities.
On April 8, 2019, the Office of Air Quality (OAQ) received an application from Woodruff and Sons, Inc. related to the construction and operation of a new portable concrete and asphalt crushing operation. The initial location of this portable source is in LaPorte County. This source is going to be approved for operation in all areas of Indiana, except Lake and Porter Counties, due to additional requirements for these two (2) specific counties.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaPorte County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatilе organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) PM$_{2.5}$
LaPorte County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
LaPorte County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Woodruff and Sons, Inc. on April 8, 2019, relating to the construction and operation of a portable concrete and asphalt crushing operation.

All raw material is loaded with an excavator into a pre-screen feeder. This feeder feeds the raw material to a crusher. The material goes to the crusher and deposits onto a feed conveyor. This feed conveyor conveys the material to a finished product screen. Any oversize materials from this finished product screen is deposited on a return conveyor and to the crusher to be crushed again. All finished product that passes thru the screen is deposited on a discharge conveyor which then continues on to the return conveyor.

The source consists of the following new emissions units:
(a) One (1) Material Handling Operation, identified as MHO-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour concrete and asphalt, using no controls, exhausting outdoors, and consisting of the following:

(A) One (1) Unloading Operation, identified as UO-1;

(B) Four (4) Conveyors;

(C) One (1) Feeder, identified as F-1;

(D) Four (4) Transfer Points, identified as TP-1 through TP-4; and

(E) One (1) Vibratory Shaker Screen, identified as VSS-1.

(b) One (1) Crusher, identified as C-1, approved in 2019 for construction, with a maximum throughput of 100.0 tons per hour of concrete and asphalt, using no controls, and exhausting outdoors.

(c) One (1) Diesel-fired Generator, identified as G-1, approved in 2019 for construction, with a maximum output rating of 470.0 HP, using no controls, and exhausting outdoors. This generator is used to power the crusher.

[This generator is considered a non-road engine.]

(d) Unpaved Roads.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1) of PM, PM$_{10}$, and PM$_{2.5}$ is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The
potential to emit of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued a New Source Construction and Minor Source Operating Permit (MSOP).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db and 326 IAC 12, are not included in the permit for the Generator (G-1), since the Generator (G-1) is not a steam generating unit.

(b) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the Generator (G-1), since the Generator (G-1) is not a steam generating unit.

(c) The requirements of the Standards of Performance for Portland Cement Plants, 40 CFR 60, Subpart F and 326 IAC 12, are not included in the permit for the source, since source is not considered a Portland cement plant, as defined in §60.61.

(d) The requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO and 326 IAC 12, are not included in the permit for the source, since the source is portable and has processing capabilities of less than 136 megagrams per hour (150 tons per hour).

(e) The requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart III and 326 IAC 20-12 are not included in the permit for the Generator (G-1), since the Generator (G-1) meets the definition of nonroad engine under 40 CFR 1068, Subpart A, §1068.30.

(f) The requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ and 326 IAC 12, are not included in the permit for Generator (G-1), since the Generator (G-1) is not a stationary spark ignition internal combustion engine.

(g) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry, 40 CFR 63, Subpart LLL and 326 IAC 20-21 are not included in the permit for this source, since this source is not considered a Portland cement plant, as defined in §63.1341.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 are not included in the permit for the Generator (G-1), since the Generator (G-1) meets the definition of nonroad engine under 40 CFR 1068, Subpart A, §1068.30.
(c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

### State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

**326 IAC 2-14-2 (Portable Sources)**
This proposed source is a portable concrete and asphalt crushing operation. It will be approved for operation in all areas of Indiana, except Lake County and Porter County, because of the additional requirements for these specific counties. This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2 and Emission Offset in 326 IAC 2-3.

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**
Since the initial location of this source is LaPorte County, and has actual emissions of NOx greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 5-1 (Opacity Limitations)**

(a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise below:

1. Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

2. Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(b) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4, when located in any of the following areas:

1. Clark County, Jeffersonville Township.
2. Dearborn County, Lawrenceburg Township.
3. Dubois County, Bainbridge Township.
4. Lake County, an area bounded on the north by Lake Michigan, on the west by the
Indiana-Illinois state line, on the south by U.S. 30 from the state line to the intersection of I-65 to the intersection of I-94 then following I-94 to the Lake-Porter county line, and on the east by the Lake-Porter county line.

(5) Marion County, except the area of Washington Township east of Fall Creek and the area of Franklin Township south of Thompson Road and east of Five Points Road.

(6) St. Joseph County, the area north of Kern Road and east of Pine Road.

(7) Vanderburgh County, the area included in the city of Evansville and Pigeon Township.

(8) Vigo County, the area within a five-tenths (0.5) kilometer radius circle centered at UTM Coordinates Zone 16 East four hundred sixty-four and fifty-two hundredths (464.52) kilometers North four thousand three hundred sixty-nine and twenty-one hundredths (4,369.21) kilometers.

c) This source is not allowed to operate in Lake and Porter Counties.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was constructed after December 13, 1985 and has potential fugitive particulate emissions of twenty-five (25) tons per year or more.

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan (which is included as Attachment A to the permit).

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (initially located in LaPorte County) is subject to the requirements of 326 IAC 6.5 when relocating in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne, Sources specifically listed in the rule shall comply with the limitations in 326 IAC 6.5-2 through 326 IAC 6.5-10, as applicable. Sources not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 shall comply with 326 IAC 6.5-1-2, if they have the potential to emit ten (10) tons or more of particulate matter (PM) and are not taking a limit of less than ten (10) tons of particulate matter (PM).

This source, when relocating in one of the counties above, has the potential to emit ten (10) tons or more of particulate matter (PM) and is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.5 applies and the requirements are included in the permit.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in LaPorte County) is not subject to the requirements of 326 IAC 6.8 because it is not approved to be located in Lake County.
State rule applicability for this source has been reviewed as follows:

Due to additional requirements, this portable source is not approved to relocate in Lake and Porter Counties.

**Material Handling Operation**

The following evaluation applies for all counties in Indiana, except Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, Wayne Lake and Porter counties:

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1.5(14), the Unloading Operation (UO-1) is not subject to the requirements of 326 IAC 6-3, since it has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1.5(14), the Conveyors are not subject to the requirements of 326 IAC 6-3, since they have combined potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1.5(14), the Feeder (F-1) is not subject to the requirements of 326 IAC 6-3, since it has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1.5(14), the Transfer Points (T-1 through T-4) are not subject to the requirements of 326 IAC 6-3, since they have combined potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Vibratory Shaker Screen (VSS-1), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Vibratory Shaker Screen (VSS-1) shall not exceed 51.28 pounds per hour when operating at a process weight rate of 100.0 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 55.0 \times P^{0.11} - 40 \]

where

- \( E \) = rate of emission in pounds per hour; and
- \( P \) = process weight rate in tons per hour

Based on calculations, no control equipment is needed to comply with this limit.

The following evaluation applies for the following counties in Indiana: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, Wayne Lake and Porter:

**326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. The following facilities (approved in 2019 for construction) were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the facilities each shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
(a) Unloading Operation (UO-1)  
(b) Conveyors  
(c) Feeder (F-1)  
(d) Transfer Points (T-1 through T-4)  
(e) Vibratory Shaker Screen (VSS-1)

**Generator**

This generator is considered a non-road engine, therefore no emissions are accounted from it.

**Crusher**

The following evaluation applies for all counties in Indiana, except Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, Wayne Lake and Porter counties:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1.5(14), the Crusher (C-1) is not subject to the requirements of 326 IAC 6-3, since it has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

The following evaluation applies for the following counties in Indiana: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, Wayne Lake and Porter:

326 IAC 6.5 (PM Limitations Except Lake County)

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. The Crusher (C-1) (approved in 2019 for construction) was not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the Crusher (C-1) shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

### Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 8, 2019.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 777-41308-05484. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.
(a) If you have any questions regarding this permit, please contact Ethan Horvath, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-8397 or (800) 451-6027, and ask for Ethan Horvath or (317) 233-8397.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Appendix A: Emission Calculations
### PTE Summary

**Company Name:** Woodruff & Sons, Inc.  
**Address City** IN **Zip:** 2125E. US. Highway 12, Michigan City, Indiana 46360  
**Permit No.:** 777-41308-05484  
**Reviewer:** Ethan Horvath

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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<tr>
<td>Material Handling</td>
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<td>5.17</td>
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<tr>
<td>Crusher</td>
<td>0.53</td>
<td>0.24</td>
<td>0.04</td>
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<td>Unpaved Roads²</td>
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<td>49.41</td>
<td>1.45</td>
<td>11.32</td>
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1 PM₂.₅ = direct PM₂.₅  
2 Fugitive road emission have been conservatively estimated at 25.0 tpy, due to lack of information provided by the source.  
3 Non-road engine
Appendix A: Emission Calculations

Material Handling

Company Name: WOODRUFF & SONS, INC.
Address City IN Zip: 212SE. US. Highway 12, Michigan City, Indiana 46360
Permit No.: 777-4136-05404
Reviewer: Ethan Horvath

Equation from AP 42, Chapter 13.2.4, Figure 1

\[ E = k \cdot 0.0032 \cdot \left( \frac{U}{5} \right)^{1.3} \cdot \left( \frac{M}{2} \right)^{1.4} \]

- \( k \) = 0.74 Particle Size Multiplier < 30 Um
- \( k \) = 0.35 Particle Size Multiplier < 10 Um
- \( k \) = 0.053 Particle Size Multiplier < 2.5 Um
- \( U \) = 15 Wind Speed (mph)
- \( M \) = 0.7 Moisture Content (%)

---

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Number of Units</th>
<th>Maximum Capacity (lb/hr)</th>
<th>PM10 Emission Factor (lb/hr)</th>
<th>PM2.5 Emission Factor (lb/hr)</th>
<th>PM2.5 Emission Factor (lb/tn)</th>
<th>Uncontrolled Potential to Emit (lb/hr)</th>
<th>Uncontrolled Potential to Emit (lb/tn)</th>
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<tr>
<td>Unloading</td>
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<td>200,000.00</td>
<td>1.6E-05</td>
<td>1.6E-05</td>
<td>1.6E-05</td>
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<tr>
<td>Unloading</td>
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<tr>
<td>Feeder</td>
<td>1</td>
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<td>3.0E-03</td>
<td>1.1E-03</td>
<td>1.1E-03</td>
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<td>Transfer Points</td>
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<td>Screening</td>
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<td></td>
<td></td>
<td><strong>3.34</strong></td>
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Note:
- Emission Factors for Unloading, Feeder, Transfer Points, and Screening taken from AP-42, Chapter 11, Table 11.19.2-2.
- Emission Factors for Conveyors are calculated from the equation above.
- Moisture Content (%) is the mean of crushed limestone.
- Wind Speed (mph) is assumed to be 15.0 as a worst-case scenario.

Methodology:
- Maximum Capacity (lb/hr) = Maximum Capacity (lb/hr) / 2000 (lb/tn)
- Uncontrolled Potential to Emit (lb/hr) = Number of Units * Maximum Capacity (lb/hr) * Emission Factor (lb/hr)
- Uncontrolled Potential to Emit (ton/yr) = Uncontrolled Potential to Emit (lb/hr) / 8760 (hr/yr) / 2000 (lb/tn)
Appendix A: Emission Calculations
Crusher

Company Name: Woodruff & Sons, Inc.
Address City IN Zip: 2125 E. US. Highway 12, Michigan City, Indiana 46360
Permit No.: 777-41308-05484
Reviewer: Ethan Horvath

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (tn/hr)</th>
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<tbody>
<tr>
<td>Crusher (C-1)</td>
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<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{0.25}$</th>
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<tr>
<td>Emission Factor in lb/tn</td>
<td>1.20E-03</td>
<td>5.40E-04</td>
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<tr>
<td>Potential to Emit in lb/hr</td>
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<td>0.05</td>
<td>0.01</td>
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<tr>
<td><strong>Potential to Emit in tn/yr</strong></td>
<td><strong>0.53</strong></td>
<td><strong>0.24</strong></td>
<td><strong>0.04</strong></td>
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Note:
Emission Factors taken from AP-42, Chapter 11, Table 11.19.2-2

Methodology:
Potential to Emit in lb/hr = Maximum Throughput (tn/hr) * Emission Factor in lb/tn
Potential to Emit in tn/hr = Potential to Emit in lb/hr * 8760 (hr/yr) / 2000 (lb/tn)
This is considered a non-road engine. These calculations are for information only and not considered part of the potential emissions.

### Emissions calculated based on output rating (hp)

<table>
<thead>
<tr>
<th>Output Horsepower Rating (hp)</th>
<th>470.0</th>
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</thead>
<tbody>
<tr>
<td>Maximum Hours Operated per Year</td>
<td>8760</td>
</tr>
<tr>
<td>Potential Throughput (hp-hr/yr)</td>
<td>4,117,200</td>
</tr>
<tr>
<td>Sulfur Content (S) of Fuel (% by weight)</td>
<td>0.050</td>
</tr>
</tbody>
</table>

#### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Output Factor in lb/hp-hr</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>7.00E-04</td>
<td>1.44</td>
</tr>
<tr>
<td>PM10*</td>
<td>4.01E-04</td>
<td>0.83</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>4.01E-04</td>
<td>0.83</td>
</tr>
<tr>
<td>SO2</td>
<td>4.05E-04</td>
<td>0.83</td>
</tr>
<tr>
<td>NOx</td>
<td>2.40E-02</td>
<td>49.41</td>
</tr>
<tr>
<td>VOC</td>
<td>7.05E-04</td>
<td>1.45</td>
</tr>
<tr>
<td>CO</td>
<td>5.50E-03</td>
<td>11.32</td>
</tr>
</tbody>
</table>

*PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Output Factor in lb/hp-hr****</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>5.43E-06</td>
<td>1.12E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>1.97E-06</td>
<td>4.05E-03</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.35E-06</td>
<td>2.78E-03</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.52E-07</td>
<td>1.14E-03</td>
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<tr>
<td>Acetaldehyde</td>
<td>1.76E-07</td>
<td>3.63E-04</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.52E-08</td>
<td>1.14E-04</td>
</tr>
<tr>
<td>Total PAH HAPs***</td>
<td>1.48E-06</td>
<td>3.05E-03</td>
</tr>
</tbody>
</table>

***PAH = Polyaromatic Hydrocarbon  (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Tables 3.3-1 and 3.4-1).

#### Potential Emission of Total HAPs (tons/yr)

| Potential Emission of Total HAPs (tons/yr) | 2.27E-02 |

#### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1, 3.4-2, 3.4-3, and 3.4-4.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
September 5, 2019

Bruce Woodruff  
Woodruff and Sons, Inc.  
PO Box 450  
Michigan City, IN 46360

Re: Public Notice  
Woodruff and Sons, Inc.  
Permit Level: MSOP New Srce Const Minor PSD  
Permit Number: 777-41308-05484

Dear Mr. Woodruff:

Enclosed is a copy of your draft MSOP New Source Construction Minor PSD, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Michigan City Public Library, 4th Street and Franklin in Michigan City, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ethan Horvath, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,

Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures

PN Applicant Cover Letter 4/12/19
September 5, 2019

To: Michigan City Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Woodruff and Sons, Inc.
Permit Number: 777-41308-05484

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

September 5, 2019
Woodruff and Sons, Inc.
777-41308-05484

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

September 5, 2019

A 30-day public comment period has been initiated for:

**Permit Number:** 777-41308-05484
**Applicant Name:** Woodruff and Sons, Inc.
**Location:** Michigan City, La Porte County, Indiana

The public notice, draft permit and technical support documents can be accessed via the [IDEM Air Permits Online](http://www.in.gov/ai/appfiles/idem-caats/) site at:

http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
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<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Remarks</th>
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<tbody>
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<td>LaPorte City Council/ Mayors Ofc. 801 Michigan Avenue LaPorte IN 46350 (Local Official)</td>
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<td>Michigan City Public Library 4th and Franklin Michigan City IN 46360-3393 (Library)</td>
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<td>LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)</td>
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<td>LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)</td>
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<td>Mr. Dick Paulen Barnes &amp; Thomburg 52700 Independence Court, Suite 150 Elkhart IN 46514-8155 (Affected Party)</td>
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<td>Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)</td>
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