

**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**RECOMMENDATION TO REVOKE AIR PERMIT MEMORANDUM**

Date: August 30, 2018

To: Joanne Smiddie-Brush, Section Chief  
Permits Administration Support Section  
Permits Branch  
Office of Air Quality

Thru: Phil Perry, Branch Chief  
Compliance and Enforcement  
Branch  
Office of Air Quality

From: Brooke A. Myer, Air Compliance Inspector *BAM*  
Roger Letterman, Section Chief  
Compliance and Enforcement Branch  
Office of Air Quality

Source Name: White River Gravel Company, Inc.

Source ID: 109-00039

Source Location address: 11261 N Smokey Row Road, Mooresville, IN 46158

Operating Permit # to be revoked: S109-10161-00039

Based upon reviewing 326 IAC 2-1.1-9 and methods to verify closure below, the source is permanently closed and the operating air permit for White River Gravel Company, Inc. can be revoked. Please revoke the air permit and issue a Revocation and Notice of Decision.

☐ Revocation and Notice of Decision should be mailed to:

Name:

Title:

Address:

City:

State:

Zip Code:

OR

☒ There is no person identified with the source to receive the Revocation. The Revocation should take the form of a Memo to File.

cc:

**Indiana Department of Environmental Management  
Office of Air Quality  
Air Permit Revocation Supporting Documentation Log**

<b>Source Name</b>	White River Gravel Co., Inc.	<b>OAQ Inspector</b>	Brooke A. Myer
<b>Source ID</b>	109-00039	<b>Date of Review</b>	8/30/2018

**Methods used to determine/verify source closure (Check all that apply.)**

	Method (From Step 3 in SOP)	Verification	Comments
<input checked="" type="checkbox"/>	(a) Inspection/Site visit	Inspection Date:	7/24/2018 and 8/29/2018
<input type="checkbox"/>	(b) Corporate staff contact	Contact Date: Name: Title: Contact submitting information for Permit Revocation? Other Comments	Yes <input type="checkbox"/> No <input type="checkbox"/>
<input checked="" type="checkbox"/>	(c) Internet search (attach any article found)	Date of Search:	8/29/2018
<input type="checkbox"/>	(c) County Health Department	Contact & Date:	
<input checked="" type="checkbox"/>	(d) Secretary of State's website operating status	Operating?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/>	(e) Commenced construction	Commenced within 18 months? Date of Issuance of Permit:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<input checked="" type="checkbox"/>	(f) Disconnected phone number?	Phone number: Date verified	(317) 834-6818 8/29/2018
<input checked="" type="checkbox"/>	(f) Returned U.S. Mail/Email	Document(s) type: Date(s) of returned mail:	Email to <a href="mailto:torig@whiterivergravel.com">torig@whiterivergravel.com</a> 8/30/2018
<input type="checkbox"/>	(g) Non-payment of permit fees	Year(s) not paid	
<input checked="" type="checkbox"/>	(h) Non-submittal of Emission Statements, Quarterly Report, Annual Compliance Certifications, Annual Notifications	Year(s) not submitted	2017 Annual Notification
<input checked="" type="checkbox"/>	Other Information	Better Business Bureau website	Accessed 8/30/2018 states company is out of business
<input type="checkbox"/>	Other Information		

**Comments:**

**OFFICE OF AIR QUALITY  
FIELD INSPECTION REPORT**

SOURCE: White River Gravel Company, Inc.  
LOCATION: 11261 N Smokey Row Road  
CITY: Mooresville  
COUNTY: Morgan

PLANT ID NUMBER: 109-00039 *Rev*  
INSPECTED BY: Brooke Myer  
TIME IN: 8:35am TIME OUT: 9:00am  
INSPECTION DATE: 8/29/2018  
REPORTED BY: Brooke Myer *BAM*  
REPORT DATE: 8/30/2018  
ACES NUMBER: 228144

COMPLAINT INVESTIGATION: YES ☐ NO ☒ COMPLAINT NUMBER: N/A

ATTAINMENT: ☒

NONATTAINMENT: ☐ SO<sub>2</sub> ☐ CO ☐ O<sub>3</sub> ☐ NO<sub>2</sub> ☐ Pb ☐ PM<sub>10</sub> ☐ PM<sub>2.5</sub> ☐

PERMIT TYPE: SSOA  
PERMIT NO: 109-10161-00039

CHECK IF APPLICABLE: NSPS ☐ NESHAP ☐ PSD ☐ OTHER (explain):

PERSONS/TITLE INTERVIEWED:

Name	Title	Phone Number	Email
None			

**OBJECTIVES:**

Compliance Monitoring Strategy	<input type="checkbox"/>	Commitment	<input checked="" type="checkbox"/>
Multimedia Screening	<input type="checkbox"/>	Surveillance	<input type="checkbox"/>
Complaint	<input type="checkbox"/>	Other:	<input type="checkbox"/>
Mega-site: PCE <input type="checkbox"/> FCE <input type="checkbox"/>			

Announced Inspection: ☐

Unannounced Inspection: ☒

Were all relevant documents reviewed prior to the inspection: Yes ☒ No ☐ (explain)

**DESCRIPTION OF SOURCE:**

White River Gravel Company, Inc. owns and operates a sand and gravel plant located at 11261 N Smokey Row Road in Mooresville, IN.

**BACKGROUND:**

*Permit History (Previous 5 years):*

Permit Number	Issued Date	Type	Comments
10161	2/24/1999	SSOA	

*Recent Inspection History:*

Inspection Date	Inspection Type	Findings
11/14/2013	Commitment	Violations Noted

*Recent Enforcement History:*

Action	Issue Date	Violation(s)	Comments
Violation Letter	12/18/2013	Late 2012 Annual Notification	See 11/14/13 Inspection

**PROCESS DESCRIPTION/FINDINGS/OBSERVATIONS:**

**SSOA**

1. Process Description: Sand and Gravel Operation
2. Equipment: Sand and Gravel Operation
3. Pollutants Emitted: SO<sub>2</sub> ☐ NO<sub>x</sub> ☐ CO ☐ VOC ☐ PM ☒ PM<sub>10</sub> ☒ PM<sub>2.5</sub> ☒ HAPS ☐
4. Control Equipment:

Control Equipment/Identification	Exhaust to:
Wet Process	Atmosphere

5. Applicable Rules: 326 IAC 2-9 (SSOA)

6. Observations:

At the time of the inspection, I was unable to access the source as the entrance gate was closed and padlocked. I had attempted to conduct an inspection of the source previously on July 24, 2018 and the entrance gate was also closed and padlocked (see attached photo). While at the entrance, I called the source phone number [(317) 834-6818] and the phone number had been disconnected. I visited the source's website ([www.whiterivergravel.com](http://www.whiterivergravel.com)) which also provided the same phone number. The website text is not in English. The website also provided an email address to contact for sales ([torig@whiterivergravel.com](mailto:torig@whiterivergravel.com)). On August 30, 2018, I emailed this address and the email was returned as undeliverable.

According to the Better Business Bureau website, the source is out of business. The Secretary of State website states the company is still active but does not provide a phone number to contact the source.

White River Gravel did not submit the 2017 annual notification required to be submitted no later than January 30, 2018.

Emission Limit/Standard	<p><u>Condition A.1</u> Sand and gravel operation shall have no more than 9 crushers, 20 screens, and 1 conveying operation</p> <p><u>Condition A.2</u> Source annual throughput shall not exceed 1,000,000 tons per year.</p> <p><u>Condition A.4</u> Wet process or continuous wet suppression shall be used.</p> <p><u>Condition A.5</u> All equipment that generate particulate matter (PM) emissions and any associated control devices shall be operated and maintained at all times, in such a manner, as to meet all of the requirements of this SSOA.</p> <p><u>Condition A.6</u> Visible emissions from the screening and conveying operations shall not exceed an average of 10% in 24 consecutive readings in a 6 minute period. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.</p> <p><u>Condition A.7</u> Visible emissions from the crushing operations shall not exceed an average of 15% opacity in 24 consecutive readings in a 6 minute period. Compliance with this limitation shall be determined by 40 CFR</p>
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	<p>60, Appendix A, Method 9.</p> <p><u>Condition A.8</u></p> <p>Fugitive particulate matter (PM) emissions of this source shall be controlled by applying water on all storage piles and unpaved roadways on an as needed basis, such that the following visible emission conditions are met:</p> <p>Visible emissions from any storage pile shall not exceed 20% in 24 consecutive readings in a 6 minute period. This limitation shall not apply during periods when application of control measures are ineffective or unreasonable due to sustained high winds speeds. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately 4 feet from the surface at the point of maximum opacity. The observer shall stand approximately 15 feet from the plume and at approximately right angles to the plume.</p> <p>Visible emissions from unpaved roadways shall not exceed an average instantaneous opacity of 20%. Average instantaneous opacity shall be the average of 12 instantaneous opacity readings, taken for 4 vehicle passes, consisting of 3 opacity readings for each vehicle pass. The 3 opacity readings for each vehicle pass shall be taken as follows:</p> <p>The first reading shall be taken at the time of emission generation.</p> <p>The second reading shall be taken 5 seconds later.</p> <p>The third reading shall be taken 5 seconds after the second reading, or 10 seconds after the first reading.</p> <p>The three readings shall be taken at the point of maximum opacity. The observer shall stand approximately 15 feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately 4 feet above the surface of the unpaved roadway.</p> <p><u>Condition A.9</u></p> <p>Fugitive particulate emissions shall not escape beyond the property line or boundaries of the source property, right of way, or easement on which the source is located.</p>
Preventive Maintenance Plan	Required: <input type="checkbox"/> Prepared: <input type="checkbox"/> Available on Site: <input type="checkbox"/> Adequate: <input type="checkbox"/> N/A: <input checked="" type="checkbox"/>
Compliance Response Plan	Required: <input type="checkbox"/> Prepared: <input type="checkbox"/> Available on Site: <input type="checkbox"/> Adequate: <input type="checkbox"/> N/A: <input checked="" type="checkbox"/>
Stack Testing Requirements	N/A
Compliance Monitoring	N/A
Compliance Determination	N/A
Recordkeeping	<p><u>Condition A.3</u></p> <p>Records of the annual throughput, based on a calendar year, shall be prepared and maintained for a minimum period of 5 years.</p> <p>Are required records on site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Type of records checked: Annual throughputs</p> <p>Dates or amount of records checked: N/A</p> <p>Are records consistent with observations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
Reporting	<p><u>Condition B.1</u></p> <p>Provide an annual notice to the commissioner, stating that the source is in operation, and certifying that its operations are in compliance with this SSOA. This report shall be submitted no later than January 30 of each year.</p> <p><u>Condition B.2</u></p> <p>Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within 1 week of its occurrence.</p>

	<p>Have all required reports been submitted in a timely manner?          Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Are reports consistent with observations?          Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
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7. Compliance Status:

At the time of the inspection, no violations of air pollution rules or of this permit section were observed.

8. Additional Comments:

None.

**GENERAL SOURCE ISSUES:**

- Does the permit accurately represent the emission units observed? Yes ☒ No ☐ N/A ☐  
If no, explain:
- Have violations been documented by photographs? Yes ☐ No ☒ N/A ☐
- Were Pollution Prevention opportunities discussed? Yes ☐ No ☒ N/A ☐
- Per the source, are they required to have a Risk Management Plan? Yes ☐ No ☒ N/A ☐  
If yes, does the source have a plan? Yes ☐ No ☐ N/A ☒  
Have the employees been trained? Yes ☐ No ☐ N/A ☒
- Has the source submitted an acceptable Annual Compliance Certification for the current applicable year? Yes ☐ No ☐ N/A ☒

**ADDITIONAL COMMENTS:**

Martin Marietta is required to submit an Annual Notification no later than January 30 of each year. The source submitted the 2013, 2014, and 2016 calendar year Annual Notifications by the applicable due dates. However, the 2015 and 2017 calendar year Annual Notifications have not been submitted to date.

**CONCLUSIONS:**

The source appears to be temporarily closed. I recommend revoking the air permit based on observations made during this inspection, the inability to contact company personnel via email or phone, the Better Business Bureau website stating the company is out of business, and non-submittal of the 2017 annual notification.

**RECOMMENDATIONS:**

It is recommended the air permit be revoked. An Inspection Summary will not be sent as I did not enter the company's property.

**EXIT INTERVIEW:**

I was unable to contact a company representative during my inspection, therefore no exit interview was conducted.

**ATTACHMENTS:**

1 Photo

**Photo 1**



**Facility Name:** White River Gravel Company, Inc. (109-00039)

**Photographer:** Brooke A. Myer, IDEM OAQ

**Date and Time:** July 24, 2018; 12:24pm

**Others Present:** None

**Location and Description:** Entrance to White River Gravel Company, Inc. located on Smokey Row Road in Mooresville, IN (Morgan County). The entrance is padlocked.

