NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and Source Specific Operating Agreement (SSOA) for Bit Mat Products of Ohio DBA Advantage Concrete in Steuben County

SSOA No.: S151-41886-00079

The Indiana Department of Environmental Management (IDEM) has received an application from Bit Mat Products of Ohio DBA Advantage Concrete, located at 3248 W 800 S, Ashley, IN 46705, for a new source construction and SSOA. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Bit Mat Products of Ohio DBA Advantage Concrete to construct and operate a new stationary ready-mix concrete plant.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited pursuant to the conditions contained in the SSOA. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and 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:

Carnegie Public Library
322 S Wayne St.
Angola, IN 46703

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

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 S151-41886-00079 in all correspondence.

Comments should be sent to:

Travis Flock
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCM 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Travis Flock or (317) 233-1782
Or dial directly: (317) 233-1782
Fax: (317) 232-6749 attn: Travis Flock
E-mail: TIFlock@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 Travis Flock of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Bit Mat Products of Ohio DBA Advantage Concrete  
3248 W 800 S  
Ashley, IN 46705

(hein 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 New Source Review (NSR) Permit and Source Specific Operating Agreement (SSOA).

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 2-9 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 Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.

| Source Specific Operating Agreement No. S151-41886-00079  
Master Agency Interest ID.: 125058 |
|---|---|
| Issued by:  
Brian Williams, Section Chief  
Permits Branch  
Office of Air Quality | Issuance Date: |
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 pursuant to 326 IAC 2.

A.1 General Information

The Permittee owns and operates a stationary ready-mix concrete plant.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>3248 W 800 S, Ashley, IN 46705</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>260-587-9113</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3273 (Ready-mixed concrete)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Steuben County</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Source Specific Operating Agreement (SSOA) Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2 Source Summary

This stationary source consists of the following:

(a) Ready-Mix Concrete Batch Operation [326 IAC 2-9-9]

(b) The source also contains the following exempt unit as defined in 326 IAC 2-1.1-3(e)(1):

(1) One (1) natural gas-fire hot water heater burner, with a maximum heat capacity of 2.1 MMBtu/hr.

A.3 New Source Review and SSOA Applicability [326 IAC 2-9-1] [326 IAC 2-1.1-3(d)]

(a) This source, otherwise required to have a permit under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8, has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.

(b) Pursuant to 326 IAC 2-9-1(g), the source may apply for up to four (4) different SSOAs contained in 326 IAC 2-9.

(c) Pursuant to 326 IAC 2-1.1-3(d), this New Source Review Permit is required for the following:

(1) Ready-mix concrete batch operation complying with 326 IAC 2-9-9; and
(2) One (1) natural gas-fire hot water heater burner, with a maximum heat capacity of 2.1 MMBtu/hr.

because the source-wide limited potential to emit of one or more criteria pollutants is greater than twenty-five (25) tons per year.
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  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.3  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.4  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.5  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.6  Property Rights or Exclusive Privilege

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

B.7  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.8 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to SSOA No. S151-41886-00079 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.9 Annual Notification [326 IAC 2-9-1(d)]

Pursuant to 326 IAC 2-9-1(d):

(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 SSOA.

(b) The annual notice shall be submitted in the format attached no later than January 30 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, IN 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.10 Source Modification Requirement [326 IAC 2-9-1(e)]

Pursuant to 326 IAC 2-9-1(e), before the Permittee modifies its operations in such a way that it will no longer comply with the applicable restrictions and conditions of this SSOA, it shall obtain the appropriate approval from IDEM, OAQ under 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-4.1, 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, and 326 IAC 2-8.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [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.12 Permit Revocation [326 IAC 2-1.1-9] [326 IAC 2-9-1(j)]

(a) 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:

(1) Violation of any conditions of this permit.

(2) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(3) 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.

(4) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(5) 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.

(b) Pursuant to 326 IAC 2-9-1(j), noncompliance with any applicable provision 326 IAC 2-9 or any requirement contained in this SSOA may result in the revocation of this SSOA and make this source subject to the applicable requirements of a major source.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-9]

C.1  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 SSOA:

(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 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.2  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).

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

C.3  Compliance with Applicable Requirements [326 IAC 2-9-1(i)]

Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the Permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63.

Record Keeping and Reporting Requirements [326 IAC 2-9]

C.4  General Record Keeping Requirements [326 IAC 2-9-1(f)]

Pursuant to 326 IAC 2-9-1(f), records of all required monitoring data, reports and support information required by this SSOA shall be physically present or electronically accessible at the source location for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.5  Reporting Requirements [326 IAC 2-9-1(h)]

Pursuant to 326 IAC 2-9-1(h), any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
SECTION D  OPERATION CONDITIONS

Operation Description: Ready-Mix Concrete Batch Operation [326 IAC 2-9-9]

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

Emission Limitations and Standards [326 IAC 2-9]

D.1 Ready-Mix Concrete Batch Operation Limitation [326 IAC 2-9-9(b)(1)]

Pursuant to 326 IAC 2-9-9(b)(1), the production from the concrete batch operation shall not exceed three hundred thousand (300,000) cubic yards per year.

D.2 Opacity [326 IAC 2-9-9(b)(3)]

Pursuant to 326 IAC 2-9-9(b)(3), fugitive particulate emissions from the cement and aggregate silos shall be controlled by operating dust collectors such that visible emissions do not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

D.3 Fugitive Emissions [326 IAC 2-9-9(b)(4)] [326 IAC 2-9-9(b)(8)]

(a) Pursuant to 326 IAC 2-9-9(b)(4), the fugitive particulate matter (PM) emissions from all aggregate storage piles, unpaved roadways, and aggregate transfer processes of this source shall be controlled by applying water on an as needed basis, such that the following visible emission conditions are met:

(1) The visible emissions from any storage pile shall not exceed twenty percent (20%) in twenty-four (24) consecutive readings in a six (6) minute period. This limitation shall not apply during periods when application of control measures are ineffective or unreasonable due to sustained high wind speeds. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

(2) The visible emissions from unpaved roadways shall not exceed an average instantaneous opacity of twenty percent (20%). Average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

(A) The first reading shall be taken at the time of emission generation.

(B) The second reading shall be taken five (5) seconds after the first.

(C) The third reading shall be taken five (5) seconds after the second reading, or ten (10) seconds after the first reading.

The three (3) readings shall be taken approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

(3) Visible emissions from the aggregate transferring processes shall not exceed an average instantaneous opacity of twenty percent (20%). The average
instantaneous opacity shall be the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) material loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet, but no more than one-fourth (1/4) mile, from the plume and at approximately right angles to the plume.

(b) Pursuant to 326 IAC 2-9-9(b)(8), the fugitive particulate emissions at the ready-mix concrete batch plant shall not escape beyond the property lines or boundaries of the source property, right of way, or easement on which the source is located pursuant to 326 IAC 6-4.

Compliance Determination Requirements [326 IAC 2-9]

D.4 Particulate [326 IAC 2-9-9(b)(5)] [326 IAC 2-9-9(b)(6)]
Pursuant to 326 IAC 2-9-9(b)(5) and 326 IAC 2-9-9(b)(6), the owner or operator shall comply with the following:

(a) All equipment that generate particulate matter (PM) emissions and any associated control devices shall be operated and maintained at all times of plant operation, in such a manner, as to meet all of the requirements of Conditions D.2 and D.3.

(b) All cement transferring processes shall always be enclosed.

Record Keeping and Reporting Requirements [326 IAC 2-9]

D.5 Record Keeping Requirements [326 IAC 2-9-9(b)(2)] [326 IAC 2-9-9(b)(7)]
Pursuant to 326 IAC 2-9-9(b)(2) and 326 IAC 2-9-9(b)(7):

(a) The source shall keep annual production records of the concrete batch operation at the site on a calendar year basis.

(b) The source shall maintain records on the types of air pollution control devices used at the source and the operation and maintenance manuals for those control devices.

(c) Section C - General Record Keeping Requirements of this SSOA contains the Permittee’s obligations with regard to the records required by this condition.
### SOURCE SPECIFIC OPERATING AGREEMENT (SSOA) ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-9.

<table>
<thead>
<tr>
<th><strong>Company Name:</strong></th>
<th>Bit Mat Products of Ohio DBA Advantage Concrete</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Address:</strong></td>
<td>3248 W 800 S, Ashley, IN 46705</td>
</tr>
<tr>
<td><strong>City:</strong></td>
<td>Ashley, Indiana, 46705</td>
</tr>
<tr>
<td><strong>Phone Number:</strong></td>
<td>(206) 587-9113</td>
</tr>
<tr>
<td><strong>SSOA No.:</strong></td>
<td>S151-41886-00079</td>
</tr>
</tbody>
</table>

I hereby certify that Bit Mat Products of Ohio DBA Advantage Concrete is:

- [ ] still in operation.
- [ ] no longer in operation.

I hereby certify that Bit Mat Products of Ohio DBA Advantage Concrete is:

- [ ] in compliance with the requirements of SSOA S151-41886-00079.
- [ ] not in compliance with the requirements of SSOA S151-41886-00079

<table>
<thead>
<tr>
<th><strong>Authorized Individual (typed):</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title:</strong></td>
</tr>
<tr>
<td><strong>Signature:</strong></td>
</tr>
<tr>
<td><strong>Date:</strong></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th><strong>Noncompliance:</strong></th>
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</table>
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 Bit Mat Products of Ohio DBA Advantage Concrete, located at 3248 W 800 S Ashley, IN 46705, completed construction of the ready-mixed concrete plant on _______________________ in conformity with the requirements and intent of the permit application received by the Office of Air Quality on September 3, 2019 and as permitted pursuant to the New Source Review Permit and SSOA No. 151-41886-00079 issued on ________________________.

   (Date of Completion)

5. Permittee, 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)

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________________________________________

Name________________________________________ (typed or printed)
Source Description and Location

Source Name: Bit Mat Products of Ohio DBA Advantage Concrete
Source Location: 3248 W 800 S, Ashley, IN 46705
County: Steuben County
SIC Code: 3273 (Ready-mixed concrete)
Operation Permit No.: S151-41886-00079
Permit Reviewer: Travis Flock

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bit Mat Products of Ohio DBA Advantage Concrete on September 3, 2019, for a New Source Review (NSR) and a Source Specific Operating Agreement (SSOA) for construction and operation of a new stationary ready-mix concrete plant.

Source Definition

The following plants are considered in the source determination:

(a) Bit Mat Products of Ohio DBA Advantage Concrete’s ready-mix concrete plant located at 3248 W. 800 S., Ashley, IN 46075, Source ID 151-00079, and

(b) Klink Trucking Incorporated’s trucking terminal located at 3320 W. 800 S., Ashley, IN 46705, no Source ID assigned, a for-hire trucking company that provides material transportation services using tankers and trucks for various construction projects involving asphalt, concrete, and chemicals/solvents.

Advantage Concrete will use the services of the trucking terminal to deliver its concrete. The terminal does not have an operating permit, agreement, or registration with IDEM. IDEM, OAQ has examined whether these plants are part of the same source. The term “source” is defined at 326 Indiana Administrative Code 2-1-73. The Indiana Administrative Code is available at http://www.in.gov/legislative/iac/iac_title?iact=326 on the Internet. In order for these plants to be considered as a single source, all three of the following criteria must be met:

(a) The plants must have common ownership and/or control;

(b) The plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility to the other; and

(c) The plants must be located on the same, contiguous or adjacent properties.

First Criteria - Common Ownership or Control:
The first criteria to be considered is whether these plants are under common ownership or control. IDEM’s Nonrule Policy Document Air-005 applies to the definition of “major source” in 326 IAC 2-7-1(22). Since the definition of major source and source are almost identical, Air-005 is also helpful guidance in defining a source. All of IDEM’s nonrule policy documents are available at https://www.in.gov/idem/7110.htm on IDEM’s website. NPD Air-005 states:
Common ownership may exist in several forms.
- If a third party has ownership of fifty-one percent (51%) or more in each of two (2) or more entities, common ownership exists.
- If two (2) or more entities share common corporate officers, in whole or in substantial part, who are responsible for the day-to-day operations of the entities, common ownership exists.
- If one entity has fifty-one percent (51%) or greater ownership of another entity, common ownership exists.

Klink Trucking is owned by several Klink family members, including Wayne Klink, none of whom have a majority interest. Wayne Klink is the fifty-one (51%) owner of Bit Mats Products of Ohio DBA Advantage Concrete. The companies do not share common corporate officers, in whole or substantial part, who are responsible for the day-to-day operations of the plants. There is no common ownership between the plants.

**Common Control Test:**
Where there is no common ownership, IDEM, OAQ must determine if there is common control. NPD Air-005 sets out two independent tests to determine if common control exists when there is no common ownership.

**First Common Control Test - Auxiliary Activity Test:**
The first test common control test, the auxiliary activity test, determines whether one plant performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:
- Is a majority of the output of the auxiliary activity provided to the primary activity?
- Can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?
- Can the primary activity assume control of the auxiliary activity under certain circumstances?
- Is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The concrete plant does not provide a raw material or perform an integral part of the production process for the trucking terminal. The concrete plant is a customer of the trucking terminal, using its trucking services to deliver the concrete. The trucking terminal does not perform an integral part of the concrete production process. The concrete is fully manufactured and ready for use when it is picked up for delivery. Even if concrete delivery was part of the concrete production process, the trucking terminal provides a majority of its for-hire delivery services to other companies. The trucking terminal does not need the concrete plant’s consent to provide services to third-parties. Neither plant can assume control of the other plant under any circumstances. Neither plant is required to complete periodic reports to the other plant. The first common control test is not satisfied.

**Second Common Control Test - But/For Test:**
The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. The concrete plant does ship all of its concrete using the delivery services of the trucking terminal. The concrete is then delivered to the concrete plant’s customers. If the trucking terminal were to close, the concrete plant could easily contract with another for-hire delivery service. The trucking terminal does
not provide a majority of its services to the concrete plant. Therefore, the second common control test is also not satisfied.

**Common Control Test - Conclusion:**
The plants are not under common control. The first criteria of the source definition is not met.

**Second Criteria - Common SIC Code or Support Facility:**
The second criteria is whether either of the plants have a common two-digit Standard Industrial Classification (SIC) Code or if one plant serves as a support facility for the other plant. The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at [http://www.osha.gov/pls/imis/sic_manual.html](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

Klink Trucking Company has the two-digit SIC Code 42, for the Major Group of Motor Freight Transportation and Warehousing. Bit Mat Products of Ohio DBA Advantage Concrete has the two-digit SIC Code 32, for the Major Group of Stone, Clay, Glass and Concrete Products.

**Support Facility Relationship**
A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The Klink Trucking terminal will provide about 5% of its total services to Advantage Concrete. Advantage Concrete will use the terminal’s delivery services, but the concrete will go to concrete plant’s customers. Since the plants have different two-digit SIC Codes and do not have a support facility relationship, the second criteria of the source definition is not met.

**Third Criteria - Same, Contiguous, or Adjacent Properties:**
The third and last criteria of the source definition is whether the plants are on the same, contiguous or adjacent properties. Plants located on properties that share a common property border are contiguous. The plants are located on properties that share a common border. The plants meet the third criteria of the source definition.

**Source Determination - Final Conclusion:**
The Advantage Concrete plant and the Klink Trucking terminal do not meet all three criteria of the source definition. IDEM, OAQ finds that the plants are not part of the same source.

<table>
<thead>
<tr>
<th><strong>Existing Approvals</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>There have been no previous approvals issued to this source.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Permit Level Determination – NSR and SSOA</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>This source is obtaining a New Source Review (NSR) Permit and a Source Specific Operating Agreement (SSOA) for approval to construct (pursuant to 326 IAC 2-5.1-3) and operate (pursuant to 326 IAC 2-9), because the source-wide limited potential to emit of one or more criteria pollutants is greater than twenty-five (25) tons per year.</td>
</tr>
<tr>
<td>This source consists of the following operations:</td>
</tr>
<tr>
<td>Ready-mix concrete batch operation complying with 326 IAC 2-9-9;</td>
</tr>
<tr>
<td>The source also contains the following exempt unit as defined in 326 IAC 2-1.1-3(e)(1):</td>
</tr>
<tr>
<td>(a) One (1) natural gas-fired hot water heater burner, with a maximum heat capacity of 2.1 MMBtu/hr.</td>
</tr>
</tbody>
</table>
Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The natural gas-fired hot water heater burner is not subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, because this unit has a maximum heat capacity less than 10 MMBtu/hr.

(b) The requirements of the New Source Performance Standard (NSPS) for Portland Cement Plants, 40 CFR 60, Subpart F (326 IAC 12), are not included in the SSOA, because this source does not meet the definition of a Portland Cement plant.

(c) This source is not subject to the New Source Performance Standards for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO (326 IAC 12), because there is no physical crushing or grinding operations at the source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJJ are not included in the permit for this source, since the natural gas-fired hot water heater burner is a gas-fired hot water heater, and pursuant to 40 CFR 63.11195(e) and (f), is exempt from the requirements of this subpart.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Portland Cement Manufacturing Industry 40 CFR 63, Subpart LLL and (326 IAC 20-27) are not included in the permit for this source, since this source is not a Portland cement manufacturing plant as defined in 40 CFR 63.1341.

(b) 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 SSOA.

Compliance Assurance Monitoring (CAM)

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 Determination

The following state rules are applicable to the source:

326 IAC 2-9 (Source Specific Operating Agreement Program)

SSOA applicability is discussed under the Permit Level Determination – SSOA section above.
326 IAC 5-1 (Opacity Limitations)
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 stated in this permit:

(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.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from the natural gas-fired hot water heater burner shall be limited by the following equation:

\[ Pt = \frac{1.09}{Q^{0.26}} \]

where;

\( Pt \) = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.
\( Q \) = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For \( Q \) less than 10 mmBtu/hr, \( Pt \) shall not exceed 0.6.

The maximum heating capacity for natural gas-fired hot water heater burner is 2.1 MMBtu/hr, therefore the pounds of particulate matter emitter per million Btu (lb/mmBtu) heat shall not exceed 0.6

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)
The requirements of 326 IAC 6-5 are not included in the SSOA, since each of the SSOAs contained under 326 IAC 2-9 (Source Specific Operating Agreement Program) that limit fugitive emissions include pre-established fugitive dust control measures.

326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring, Record Keeping, and Reporting Requirements

For a source that operates under 326 IAC 2-9 (Source Specific Operating Agreement Program), the source is required to comply with the pre-established emission limitations and standards, compliance
determination, compliance monitoring, and record keeping and reporting requirements contained in the specific SSOA(s) under 326 IAC 2-9. For a detailed description of the requirements specific to each SSOA, see 326 IAC 2-9.

### 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 September 3, 2019. Additional information was received on September 10, 2019 relating to the source providing a completed source determination form checklist.

The construction and operation of this source shall be subject to the conditions of the attached New Source Review (NSR) Permit and SSOA No. S151-41886-00079. The staff recommends to the Commissioner that this New Source Review (NSR) Permit and SSOA be approved.

### IDEM Contact

(a) If you have any questions regarding this permit, please contact Travis Flock, 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) 233-1782 or (800) 451-6027, and ask for Travis Flock or (317) 233-1782.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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](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](http://www.in.gov/idem/6900.htm).
### Emission Calculations

#### Emissions Summary

**Company Name:** Bit Mat Products of Ohio DBA Advantage Concrete  
**Source Address:** 3248 W 800 S, Ashley IN, 46705  
**Permit Number:** S151-41886-00079  
**Reviewer:** Travis Flock

---

#### Applicable SSOA Pollutant and Production Limits

<table>
<thead>
<tr>
<th>SSOA Process Type</th>
<th>SSOA Limit(s) Citation(s)</th>
<th>Applicable SSOA Pollutant and Production Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ready-Mix Concrete Batch Operation</td>
<td>326 IAC 2-9-9(b)(1), (3), (4), (6) and (8)</td>
<td>SSOA Limits= 300,000 cubic yards of concrete/year product. Opacity and visible emissions shall be limited according to the SSOA.</td>
</tr>
</tbody>
</table>

---

#### SSOA Limited Potential to Emit (PTE) (tons/year)

<table>
<thead>
<tr>
<th>SSOA Process Type</th>
<th>SSOA Limit(s) Citation(s)</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>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ready-Mix Concrete Batch Operation</td>
<td>326 IAC 2-9-9(b)(1), (3), (4), (6) and (8)</td>
<td>24.99</td>
<td>24.99</td>
<td>24.99</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>none</td>
</tr>
<tr>
<td>Hot Water Heater Burner</td>
<td>NA</td>
<td>0.02</td>
<td>0.07</td>
<td>0.07</td>
<td>0.01</td>
<td>0.90</td>
<td>0.05</td>
<td>0.76</td>
<td>0.02</td>
<td>0.02</td>
</tr>
</tbody>
</table>

**Total Source-Wide SSOA Limited/Controlled PTE (tons/year):** 25.01 PM10 and PM2.5 emissions assumed equal

---

#### Methodology

**PM10 and PM2.5 emissions assumed equal**

---

#### Emission Calculation Methodology

SSOA Rule was developed to limit/control non-fugitive emissions to less than 25 tons/year PM, PM10, and PM2.5
### Appendix A: Emission Calculations

**Ready-Mix Concrete Batch Operation**

**Company Name:** Bit Mat Products of Ohio DBA Advantage Concrete  
**Source Address:** 3248 W 800 S, Ashley IN, 46705  
**Permit Number:** S151-41886-00079  
**Reviewer:** Travis Flock

#### SSOA Limited/Controlled Potential to Emit (PTE) (tons/year)

<table>
<thead>
<tr>
<th>SSOA Process Type</th>
<th>SSOA Limit(s) Citation(s)</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>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ready-Mix Concrete Batch Operation</td>
<td>326 IAC 2-9-9(b)(1), (3), (4), (6) and (8)</td>
<td>25</td>
<td>24.99</td>
<td>24.99</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>none</td>
</tr>
</tbody>
</table>

**Assumptions:** PM10 and PM2.5 emissions assumed equal

**Methodology:** NA=Not Applicable

**SSOA Process Type:** Ready-Mix Concrete Batch Operation [326 IAC 2-9-9(b)(1), (3), (4), and (8)]

**Emission Calculation Methodology:** SSOA was developed to limit/control non-fugitive emissions to less than 25 tons/year PM, PM10, and PM2.5.
### Emissions Calculations for Water Heater - Natural Gas Combustion Only

**Company Name:** Bit Mat Products of Ohio DBA Advantage Concrete  
**Source Address:** 3248 W 800 S, Ashley IN, 46705  
**Permit Number:** S151-41886-00079  
**Reviewer:** Travis Flock

#### HHV Heat Input Capacity

<table>
<thead>
<tr>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:**  
- Uncontrolled = 100,  
- Low NOx Burner = 50,  
- Low NOx Burners/Flue gas recirculation = 32

#### Potential Throughput

<table>
<thead>
<tr>
<th>Potential Throughput</th>
<th>mmscf</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1020</td>
<td>18.0</td>
<td></td>
</tr>
</tbody>
</table>

#### Emission Factors for Hazardous Air Pollutants (HAPs)

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.9E-05</td>
<td>1.1E-05</td>
<td>6.8E-04</td>
<td>0.02</td>
<td>3.1E-05</td>
<td>0.02</td>
<td></td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.5E-06</td>
<td>9.9E-06</td>
<td>1.3E-05</td>
<td>3.4E-06</td>
<td>1.9E-05</td>
<td>4.9E-05</td>
<td></td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
October 16, 2019

Kim Smith
Bit Mat Products of Ohio DBA Advantage Concrete
PO Box 100
Ashley, IN   46705

Re: Public Notice
Bit Mat Products of Ohio DBA Advantage Concrete
Permit Level: SSOA New Source Review
Permit Number: 151-41886-00079

Dear Ms. Smith:

Enclosed is a copy of your draft SSOA New Source Review, 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 Angola Carnegie Public Library, 322 South Wayne Street in Angola, 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 Travis Flock, 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 3-1782 or dial (317) 233-1782.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 16, 2019

To: Angola Carnegie 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: Bit Mat Products of Ohio DBA Advantage Concrete
Permit Number: 151-41886-00079

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

October 16, 2019
Bit Mat Products of Ohio DBA Advantage Concrete
151-41886-00079

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.
Mail Code 61-53

<table>
<thead>
<tr>
<th>IDEM Staff</th>
<th>TAWEAVER 10/16/2019</th>
<th>Bit Mat Products of Ohio DBA Advantage Concrete 151-41886-00079 (draft)</th>
<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name and address of Sender</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>Type of Mail: CERTIFICATE OF MAILING ONLY</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<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>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Kim Smith Bit Mat Products of Ohio DBA Advantage Concrete PO Box 100 Ashley IN 46705 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Steuben County Board of Commissioners 317 S Wayne Suite 2H Angola IN 46703 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Steuben County Health Department 317 S. Wayne St, Community Center Suite 3-A Angola IN 46703-1938 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)</td>
<td></td>
<td></td>
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<td></td>
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<td>Angola Carnegie Public Library 322 S Wayne St Angola IN 46703-1990 (Library)</td>
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<td>Ms. Diane Hanson 490 E 300 N Angola IN 46703 (Affected Party)</td>
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<td>Orland Town Council P.O. Box 445 Orland IN 46776 (Local Official)</td>
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<td>Wayne and Carol Klink Klink Trucking, LLC 6350 S 725 W Pleasant Lake IN 46779 (Affected Party)</td>
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<td>Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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<td>Klink Trucking, LLC 3320 W 800 S Ashley IN 46705 (Affected Party)</td>
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Total number of pieces Listed by Sender

Total number of Pieces Received at Post Office

Postmaster, Per (Name of Receiving employee)

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.