

From: [DEGUZMAN, AIDA](#)
To: michael.ragsdale@arcosa.com
Subject: RE: Arcosa LW HPB LLC - Air Permit Application No. 109-43754-00007
Date: Friday, March 05, 2021 08:59:00 AM
Attachments: [image004.png](#)
[image005.png](#)

Hi Mr. Ragsdale,

I sent this email to your consultant the 5th time but it's been undeliverable. Can you please let me know if Kurt has a new email address? I left him a voice message as well but he has not gotten back with me.

Thanks,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

(317) 413-5909 • Cell Phone

<<https://www.surveymonkey.com/r/idemcustserva>>

From: DEGUZMAN, AIDA
Sent: Friday, March 05, 2021 8:56 AM
To: kgilliam@comer-viron.com
Cc: michael.ragsdale@arcosa.com
Subject: Arcosa LW HPB LLC - Air Permit Application No. 109-43754-00007

IDEM OAQ Contact Information for Application No. 109-43754-00007 for Arcosa LWHPB LLC source modification

Dear Mr. Kurt Gilliam,

I am the permit writer assigned to the current application No. 109-43754-00007 for Arcosa LWHPB LLC. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Please email me the PTE calculation spreadsheet in Excel associated with this application. Based on the preliminary review, the PTE calculations submitted in the application for permitting purposes were calculated incorrectly.

For permitting purposes under 326 IAC 2-7-10.5, the PTE calculation must be based on maximum unlimited capacity or it must not be derated, and without the consideration of the control. Please provide the corrected Uncontrolled PTE calculation without derating the capacities of each equipment affected by the modification.

Since this project is a modification to existing Screening Plant, existing major source, PSD determination under 326 IAC 2-2, the project emissions increase must be calculated using "Actual to Projected Actual (ATPA)" test or "Actual to Potential (ATP)". Please provide the detailed ATPA or ATP calculations and the 2-year baseline actual emissions selected from the 10-year look back and indicate the years the baseline actual have been emitted.

This additional information is needed for IDEM to complete its review of the application. Therefore, this e-mail serves as a notice of deficiency (NOD) for this permit application.

Your written or emailed response (e-mail is preferred) to this NOD must be received by IDEM within sixty (60) days from the date the NOD is sent.

Pursuant to IC 13-15-4-10, the accountability time period has been suspended until the additional information has been received and determined to be adequate. IDEM's Nonrule Policy Document for Air Permit Applications: Notices of Deficiency and Placing Applications on Hold (AIR 033 NPD) is available at https://www.in.gov/idem/ctap/files/nrpd_air-033.pdf <https://www.in.gov/idem/ctap/files/nrpd_air-033.pdf>

Please specify permit application number 109-43754-00007 in all correspondence.

Please send a reply email to me confirming that you have received this request for additional information. If you have questions, concerns, or comments regarding this request for additional information, please contact me at your earliest convenience. Thank you in advance for your assistance in providing the information to complete the permitting action.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief Josiah Balogun may be contacted at 317-234-1203 or jbalogun@idem.IN.gov <<mailto:jbalogun@idem.IN.gov>> .

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

(317) 413-5909 • Cell Phone

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From: [Kurt Gilliam](#)
To: [DEGUZMAN, AIDA](#)
Cc: [Michael Ragsdale](#); [Balogun, Josiah K](#)
Subject: RE: Arcosa LW HPB LLC- Source Modification 109-43754-0007
Date: Thursday, April 22, 2021 10:13:29 AM
Attachments: [image004.png](#)
[image005.png](#)
[RSImage.png](#)

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Aida:

We are working on our response and will have it to you next week.

Thanks,

Kurt Gilliam
Director of Environmental Services

Cornerstone Environmental, Health and Safety, Inc.

O: (317) 567-9066

880 Lennox Ct., Zionsville, IN 46077

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kgilliam@corner-enviro.com

<https://protect2.fireeye.com/v1/url?k=b2e5fa4d-ed7ec306-b2e1b34d-867c6b071c6f-8ac149c07d86df43&q=1&e=97a402bf-4535-438b-b59b-8bef468b0578&u=https%3A%2F%2Fsignatures.corner-enviro.com%2F%2F5ed11716d9f9b009798cc26%2F%2F5_e62b728c36cdb00c0dd10f7%2F%2F5fa42a6d7d588f0037575050%3Frecipient%3DQURFR1VaTUFaawWRbS5fTi5nb3Y%3D>

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From: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov>

Sent: Thursday, April 22, 2021 10:11 AM

To: Kurt Gilliam <kgilliam@corner-enviro.com>

Cc: Michael Ragsdale <Michael.Ragsdale@arcosa.com>; Balogun, Josiah K <jbalogun@idem.IN.gov>

Subject: Arcosa LW HPB LLC- Source Modification 109-43754-0007

Hi Kurt,

I sent you a follow-up email on Monday, April 19, 2021 pertaining to the information I requested in the NOD sent to you on March 5, 2021, but I did not receive a response back from you.

Please let me know on where you are on this request.

Thanks,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

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From: Kurt Gilliam
To: [DEGUZMAN, AIDA](#)
Cc: [Michael Ragsdale](#)
Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-0007
Date: Monday, May 03, 2021 11:09:51 AM
Attachments: [image003.png](#)
[image004.png](#)
[RSImage.png](#)

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Aida:

Thanks for the information. Please keep in mind that work is all being done under a Self-Disclosure submittal by Arcosa. Let us know if you have questions about that.

Thanks,

Kurt Gilliam
Director of Environmental Services

Cornerstone Environmental, Health and Safety, Inc.

O: (317) 567-9066

880 Lennox Ct., Zionsville, IN 46077

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<<https://protect2.fireeye.com/v1/url?k=5886a3dd-071d9ad5-5882eadd-86e696e30194-a8ba219ede7fb45&q=1&e=bc6057e3-daa0-4933-b25c-9c4d8cef7da4&u=http%3A%2F%2Fsignatures.corner-enviro.com%2F%2F5ed11716d9f9b009798cc26%2F%2F5e62b728c36cd800e0dd10f7%2F%2F5fa42a6a7d588f003757504c%3Frecipient%3DQURFR1VaTUFAaWRlbS5JT5nb3Y%3D>>

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From: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov>
Sent: Monday, May 3, 2021 9:52 AM
To: Kurt Gilliam <kgilliam@corner-enviro.com>
Cc: Michael Ragsdale <Michael.Ragsdale@arcosa.com>
Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-00007

Kurt,

Jenny indicated that these units in the application will be permitted under 326 IAC 2-7-10.5(g), significant source modification because they were removed from the permit and now being re-permitted. For PSD applicability these units construction date will continue to be 1962. Therefore, they are grandfathered from 326 IAC 2-2. PSD rules. However, they will be referred for enforcement since they were removed from the permit but continued operating.

Please disregard the voice message I left you in your cellphone.

Thanks,

Aida

From: Kurt Gilliam <kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>>>
Sent: Monday, May 3, 2021 9:27 AM
To: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov <<mailto:ADEGUZMA@idem.IN.gov>>>
Cc: Michael Ragsdale <Michael.Ragsdale@arcosa.com <<mailto:Michael.Ragsdale@arcosa.com>>>
Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-00007

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Aida:

Please find attached, per your request, a summary of the Stationary Screening Plant permitting history. The proposed unit ID numbers should correspond to the recent permit application. Let us know if you have questions about this document.

FYI my cell phone number is 317-727-3396.

Thanks,

Kurt Gilliam
Director of Environmental Services

Cornerstone Environmental, Health and Safety, Inc.

O: (317) 567-9066

880 Lennox Ct., Zionsville, IN 46077

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kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>>

<https://protect2.fireeye.com/v1/url?k=86b0de8d-d92be7c6-86b4978d-867c6b071c6f-ec3603f952101b43&q=1&e=e302b74c-fl17-4369-b1cf-53116808cc9d&u=https%3A%2F%2Fsignatures.corner-enviro.com%2Facc%2F5ed11716d9f9b009798cc26%2F5_e62b728c36c0b00c0dd10f7%2F5_ff319457cc8e300b6292b1a%3Precipient%3DQURFR1VaTUFaAWRBbS5JT5nb3Y%3D>

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From: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov> <<mailto:ADEGUZMA@idem.IN.gov>>

Sent: Friday, April 30, 2021 9:05 AM

To: Kurt Gilliam <kgilliam@corner-enviro.com> <<mailto:kgilliam@corner-enviro.com>>

Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-00007

We want to know the permit no. where the screening plant, with its associated equipment were included and the permit no. where they were removed. Josiah opened all the Arcosa/Hydraulic Press permits and did not find this screening plant and its associated equipment where they were included and removed.

Thanks,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

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From: DEGUZMAN, AIDA

Sent: Friday, April 30, 2021 8:57 AM
To: Kurt Gilliam <kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>>>
Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-00007

Kurt,

Good morning! Can you please call me, Jenny has a question regarding the screening plant.

Thanks,

Aida DeGuzman
Sr. Environmental Engineer
Office of Air Quality
Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

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From: Kurt Gilliam <kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>>>
Sent: Thursday, April 22, 2021 10:12 AM
To: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov> <<mailto:ADEGUZMA@idem.IN.gov>>>
Cc: Michael Ragsdale <Michael.Ragsdale@arcosa.com> <<mailto:Michael.Ragsdale@arcosa.com>>>; Balogun, Josiah K <jbalogun@idem.IN.gov> <<mailto:jbalogun@idem.IN.gov>>>
Subject: RE: Arcosa LW HPB LLC - Source Modification 109-43754-00007

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Aida:

We are working on our response and will have it to you next week.

Thanks,

Kurt Gilliam
Director of Environmental Services

Cornerstone Environmental, Health and Safety, Inc.
O: (317) 567-9066
880 Lennox Ct., Zionsville, IN 46077
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kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>>

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From: DEGUZMAN, AIDA <ADEGUZMA@idem.IN.gov <<mailto:ADEGUZMA@idem.IN.gov>> >
Sent: Thursday, April 22, 2021 10:11 AM
To: Kurt Gilliam <kgilliam@corner-enviro.com <<mailto:kgilliam@corner-enviro.com>> >
Cc: Michael Ragsdale <Michael.Ragsdale@arcosa.com <<mailto:Michael.Ragsdale@arcosa.com>> >; Balogun, Josiah K <jbalogun@idem.IN.gov <<mailto:jbalogun@idem.IN.gov>> >
Subject: Arcosa LW HPB LLC- Source Modification 109-43754-00007

Hi Kurt,

I sent you a follow-up email on Monday, April 19, 2021 pertaining to the information I requested in the NOD sent to you on March 5, 2021, but I did not receive a response back from you.

Please let me know on where you are on this request.

Thanks,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

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From: [DEGUZMAN, AIDA](#)
To: [Michael Ragsdale](#); [Kurt Gilliam](#)
Subject: RE: Arcosa LW HPB LLC- Source Modification 109-43754-00007 for review
Date: Thursday, May 27, 2021 09:02:00 AM
Attachments: [image002.png](#)
[image004.png](#)
[43754_per.docm](#)
[43754_TSD.docx](#)
[43754_Calcs.xlsx](#)

Applicant Review for a Significant Source Modification to Part 70 Operating Permit Renewal No. 109-43754-00007 for Arcosa LW HPB, LLC

Dear Mr. Michael Ragsdale:

Attached is the Significant Source Modification to Part 70 Operating Permit Renewal and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to public notification.

The time clock for Significant Source Modification to Part 70 Operating Permit Renewal No. 109-43754-00007 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to public notice the permit in a timely manner, you are being allotted two (2) weeks from today to provide comments in writing, email is sufficient. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 10, 2021, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notification.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Please let me know if Arcosa LW HPB, LLC would prefer to receive paper copies or electric version of the draft and entire final issued permit, please let me know prior to the end of the applicant review period.

Please send a reply email to me immediately confirming that you have received this draft permit for review and that you are able to access these files in their current format.

Please take note that the SSM will be incorporated into the Part 70 permit through an Administrative Amendment.

Attachments:

SSM (43754 Per

Technical Support Document (43754 TSD)

Potential to Emit (43754 Calcs)

Sincerely,

Aida DeGuzman

Sr. Environmental Engineer

Office of Air Quality

Indiana Department of Environmental Management

(317) 233-4972 • adeguzma@idem.in.gov <<mailto:adeguzma@idem.in.gov>>

(317) 413-5909 • Cell Phone

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