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Vice-President

CRAIG SMITH  
Secretary

SCOTT WICK  
Treasurer



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FAX (715) 479-7438  
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September 10, 2013

Genevieve Damico  
Chief, Air Permits Section  
USEPA - Region 5  
77 West Jackson Blvd (AR-18J)  
Chicago, IL 60604

Dear Ms. Damico,

Enclosed is a Federal Minor NSR Program in Indian Country Application for New Construction, and Application for Synthetic Minor Limit, for a portable crushing facility located in Wisconsin. I have been talking with Kaushal Gupta with your office over the last few months regarding the facility and with my questions regarding the applications and permit process.

We currently operate portable crushing facilities throughout the State of Wisconsin under General Operation Permits issued by the Wisconsin Department of Natural Resources, as synthetic minor sources. At this time, we are interested in obtaining the necessary permits required by USEPA to operate a portable crusher within Indian Country, also as a synthetic minor source.

It is my understanding that USEPA is currently working on a draft general permit for crushing facilities that may be completed in 2014. If your office could let me know as soon as this permit is available, I would be interested in reviewing it to see if it would better suit our company. Also, I have spoken with Kaushal a couple of times regarding my question as to whether fugitive emissions are supposed to be included in the emission calculations or not, but have not received a definite answer back on this. When looking at Section E. on page 5 of EPA Form No. 5900-248, it would lead me to believe that fugitive emissions would not be included in calculations for crushers. However, in wanting to submit this application as complete as possible as I can initially, I have included fugitive emissions in my calculation, and if they are in fact not supposed to be included, you can easily disregard the numbers.

After you review the applications, please let me know if you need additional information. I am hoping we can move this permit forward in a timely matter. And again, if you would be willing to let me know when the general permit is available, that would be appreciated.

Sincerely,



Carolyn Lurvey  
Environmental Engineer

Enc.: Application for New Construction, EPA Form 5900-248  
Application for Synthetic Minor Limit, EPA Form 5900-246



United States Environmental Protection Agency  
Program  
Address  
Phone  
Fax  
Web address

Reviewing Authority  
Program  
Address  
Phone  
Fax  
Web address

FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY

Application for New Construction  
(Form NEW)

Please check all that apply to show how you are using this form:

- Proposed Construction of a New Source
- Proposed Construction of New Equipment at an Existing Source
- Proposed Modification of an Existing Source
- Other – Please Explain

Please submit information to:

[Reviewing Authority *REGION 5*  
Address  
Phone]

A. GENERAL SOURCE INFORMATION

1. (a) Company Name <i>PITLIK &amp; WICK, INC.</i>		2. Source Name <i>PORTABLE CRUSHER</i>	
(b) Operator Name <i>PITLIK &amp; WICK, INC.</i>			
3. Type of Operation <i>SAND &amp; GRAVEL CRUSHING</i>		4. Portable Source? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		5. Temporary Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
6. NAICS Code <i>212321</i>		7. SIC Code <i>1442</i>	
8. Physical Address (home base for portable sources) <i>SEE ATTACHMENT #1</i>			
9. Reservation*	10. County*	11a. Latitude*	11b. Longitude*
12a. Quarter Quarter Section*	12b. Section*	12c. Township*	12d. Range*

\*Provide all proposed locations of operation for portable sources

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**B. PREVIOUS PERMIT ACTIONS** (Provide information in this format for each permit that has been issued to this source. Provide as an attachment if additional space is necessary)

Source Name on the Permit <i>PITLIK &amp; WICK, INC.</i>
Permit Number (xx-xxx-xxxxx-xxxx.xx) <i>AIR POLLUTION CONTROL GENERAL OPERATION PERMIT</i> <i>998380240-620</i>
Date of the Permit Action <i>4-20-07</i>

Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

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**C. CONTACT INFORMATION**

Company Contact <i>CAROLYN LURVEY</i>		Title <i>ENVIRONMENTAL ENGINEER</i>
Mailing Address <i>8075 HWY. D EAGLE RIVER, WI 54521</i>		
Email Address <i>CLURVEY@PITLIKANOWICK.COM</i>		
Telephone Number <i>715-479-7488</i>	Facsimile Number <i>715-479-7438</i>	
Operator Contact (if different from company contact) <i>SAME</i>		Title
Mailing Address		
Email Address		
Telephone Number	Facsimile Number	
Source Contact <i>SAME</i>		Title
Mailing Address		
Email Address		
Telephone Number	Facsimile Number	
Compliance Contact <i>SAME</i>		Title
Mailing Address		
Email Address		
Telephone Number	Facsimile Number	

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#### D. ATTACHMENTS

**Include all of the following information** (see the attached instructions)

- FORM SYNMIN** - New Source Review Synthetic Minor Limit Request Form, if synthetic minor limits are being requested.
- Narrative description of the proposed production processes. This description should follow the flow of the process flow diagram to be submitted with this application.
- Process flow chart identifying all proposed processing, combustion, handling, storage, and emission control equipment.
- A list and descriptions of all proposed emission units and air pollution-generating activities.
- Type and quantity of fuels, including sulfur content of fuels, proposed to be used on a daily, annual and maximum hourly basis.
- Type and quantity of raw materials used or final product produced proposed to be used on a daily, annual and maximum hourly basis.
- Proposed operating schedule, including number of hours per day, number of days per week and number of weeks per year.
- A list and description of all proposed emission controls, control efficiencies, emission limits, and monitoring for each emission unit and air pollution generating activity.
- Criteria Pollutant Emissions** - Estimates of Current Actual Emissions, Current Allowable Emissions, Post-Change Uncontrolled Emissions, and Post-Change Allowable Emissions for the following air pollutants: particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compound (VOC), lead (Pb) and lead compounds, fluorides (gaseous and particulate), sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>), hydrogen sulfide (H<sub>2</sub>S), total reduced sulfur (TRS) and reduced sulfur compounds, including all calculations for the estimates.  
  
These estimates are to be made for each emission unit, emission generating activity, and the project/source in total.
- Modeling – Air Quality Impact Analysis (AQIA)**
- ESA (Endangered Species Act)**
- NHPA (National Historic Preservation Act)**

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**E. TABLE OF ESTIMATED EMISSIONS**

The following tables provide the total emissions in tons/year for all pollutants from the calculations required in Section D of this form, as appropriate for the use specified at the top of the form.

**E(i) – Proposed New Source**

Pollutant	Potential Emissions (tpy)	Proposed Allowable Emissions (tpy)	
PM	139.8	0.4	PM - Particulate Matter PM <sub>10</sub> - Particulate Matter less than 10 microns in size PM <sub>2.5</sub> - Particulate Matter less than 2.5 microns in size SO <sub>x</sub> - Sulfur Oxides NO <sub>x</sub> - Nitrogen Oxides CO - Carbon Monoxide VOC - Volatile Organic Compound Pb - Lead and lead compounds Fluorides - Gaseous and particulates H <sub>2</sub> SO <sub>4</sub> - Sulfuric Acid Mist H <sub>2</sub> S - Hydrogen Sulfide TRS - Total Reduced Sulfur RSC - Reduced Sulfur Compounds
PM <sub>10</sub>	57.9	0.2	
PM <sub>2.5</sub>			
SO <sub>x</sub>	0.04	0.002	
NO <sub>x</sub>	134.5	4.4	
CO	35.5	1.2	
VOC	3.8	0.1	
Pb			
Fluorides			
H <sub>2</sub> SO <sub>4</sub>			
H <sub>2</sub> S			
TRS			
RSC			

Emissions calculations must include fugitive emissions if the source is one <sup>of</sup> the following listed sources, pursuant to CAA Section 302(j):

- (a) Coal cleaning plants (with thermal dryers);
- (b) Kraft pulp mills;
- (c) Portland cement plants;
- (d) Primary zinc smelters;
- (e) Iron and steel mills;
- (f) Primary aluminum ore reduction plants;
- (g) Primary copper smelters;
- (h) Municipal incinerators capable of charging more than 250 tons of refuse per day;
- (i) Hydrofluoric, sulfuric, or nitric acid plants;
- (j) Petroleum refineries;
- (k) Lime plants;
- (l) Phosphate rock processing plants;
- (m) Coke oven batteries;
- (n) Sulfur recovery plants;
- (o) Carbon black plants (furnace process);
- (p) Primary lead smelters;
- (q) Fuel conversion plants;
- (r) Sintering plants;
- (s) Secondary metal production plants;
- (t) Chemical process plants
- (u) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
- (v) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
- (w) Taconite ore processing plants;
- (x) Glass fiber processing plants;
- (y) Charcoal production plants;
- (z) Fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, and
- (aa) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Act.

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**E(ii) – Proposed New Construction at an Existing Source or Modification of an Existing Source**

Pollutant	Current Actual Emissions (tpy)	Current Allowable Emissions (tpy)	Post-Change Potential Emissions (tpy)	Post-Change Allowable Emissions (tpy)
PM				
PM <sub>10</sub>				
PM <sub>2.5</sub>				
SO <sub>x</sub>				
NO <sub>x</sub>				
CO				
VOC				
Pb				
<b>Fluorides</b>				
H <sub>2</sub> SO <sub>4</sub>				
H <sub>2</sub> S				
TRS				
RSC				

- PM - Particulate Matter
- PM<sub>10</sub> - Particulate Matter less than 10 microns in size
- PM<sub>2.5</sub> - Particulate Matter less than 2.5 microns in size
- SO<sub>x</sub> - Sulfur Oxides
- NO<sub>x</sub> - Nitrogen Oxides
- CO - Carbon Monoxide
- VOC - Volatile Organic Compound
- Pb - Lead and lead compounds
- Fluorides - Gaseous and particulates
- H<sub>2</sub>SO<sub>4</sub> - Sulfuric Acid Mist
- H<sub>2</sub>S - Hydrogen Sulfide
- TRS - Total Reduced Sulfur
- RSC - Reduced Sulfur Compounds

[Disclaimers] The public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response, unless a modeling analysis is required. If a modeling analysis is required, the public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

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	United States Environmental Protection Agency Program Address Phone Fax Web address	Reviewing Authority Program Address Phone Fax Web address
	<b>FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY</b>  <b>Application For Synthetic Minor Limit</b> (Form SYNMIN)	

Please submit information to:

[Reviewing Authority  
Address  
Phone]

**A. GENERAL INFORMATION**

Company Name <i>PITLIK &amp; WICK, INC.</i>	Source Name <i>PORTABLE CRUSHER</i>
Company Contact or Owner Name <i>CAROLYN LURVEY</i>	Title <i>ENVIRONMENTAL ENGINEER</i>
Mailing Address <i>8075 HWY. D EAGLE RIVER, WI 54521</i>	
Email Address <i>CLURVEY@PITLIKANDWICK.COM</i>	
Telephone Number <i>715-479-7488</i>	Facsimile Number <i>715-479-7438</i>

**B. ATTACHMENTS**

For each criteria air pollutant, hazardous air pollutant and for all emission units and air pollutant-generating activities to be covered by a limitation, include the following:

- Item 1 - The proposed limitation and a description of its effect on current actual, allowable and the potential to emit.
- Item 2 - The proposed testing, monitoring, recordkeeping, and reporting requirements to be used to demonstrate and assure compliance with the proposed limitation.
- 
- Item 3 - A description of estimated efficiency of air pollution control equipment under present or anticipated operating conditions, including documentation of the manufacturer specifications and guarantees.
- 
- Item 4 - Estimates of the Post-Change Allowable Emissions that would result from compliance with the proposed limitation, including all calculations for the estimates.
- Item 5 - Estimates of the potential emissions of Greenhouse Gas (GHG) pollutants:

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[Disclaimers] The public reporting and recordkeeping burden for this collection of information is estimated to average 6 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

## Instructions

Use this form to provide general and summary information about the synthetic minor NSR source (source or plant) on Tribal lands and to indicate the emissions limitations requested. Submit this form once, in addition to FORM NEW, for each synthetic minor NSR source on Tribal lands.

### 1. Who Can Request Federally-Enforceable Limitations Under the Tribal NSR Authority?

The Tribal NSR Rule applies only to sources located within the exterior boundaries of an Indian reservation in the United States of America or other lands as specified in 40 CFR part 49, collectively referred to as "Indian country". So, to use the authority in the Tribal NSR Rule to create federally-enforceable limitations, a source must be located within Indian country. Land ownership status (for example, whether the land is owned by a Tribal member or whether the land is owned in fee or in trust) does not affect how the rule applies.

### 2. Who Might Want to Request Federally-Enforceable Limitations?

The primary reason for requesting federally-enforceable limitations is to avoid an otherwise applicable federal Clean Air Act program, rule or requirement. Many federal Clean Air Act programs use a source's "potential to emit" (PTE) air pollution to determine which rules or requirements apply. A source's PTE is based on the maximum annual operational (production, throughput, etc) rate of the source taking into consideration the capacity and configuration of the equipment and operations. Emission or operational limits can also be taken into consideration as maximums if they are federally enforceable. So, using a synthetic minor NSR permit to establish federally enforceable limitations can lower a source's PTE and possibly allow the source to avoid certain federal Clean Air Act requirements.

Three examples of federal Clean Air Act programs that use PTE to determine whether they apply are (1) the Prevention of Significant Deterioration (PSD) construction permitting program, (2) the Title V operating permit program, and (3) the Maximum Achievable Control Technology (MACT) program. For example, existing sources that are considered "major" for Title V (meaning they have the potential to emit air pollution at levels defined in that rule as "major") must apply for a Title V operating permit. If a source accepts a federally-enforceable limitation through a synthetic minor NSR permit that reduces their PTE to below the "major" threshold, and the source does not meet any of the other requirements that would trigger applicability to the part 71 program, then the source no longer needs a Title V operating permit. When planning for the construction of a new source or expansion of an existing source, a source can also accept limitations on PTE (using a synthetic minor NSR permit) that allow the source to avoid PSD. Limitations on PTE can similarly help a source to avoid new MACT standards that would otherwise apply to the source.