STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

April 28, 2006

Certified Mail No. 7005 1160 0000 1550 3338

Mr. Josh Smith
Highway Division Manager
Poe Asphalt Paving, Inc.
302 15th Street
Clarkston, WA 99403

RE: Facility ID No. 777-00084, Poe Asphalt Paving, Inc., Lewiston
Portable Hot Mix Asphalt Plant #1900, Permit to Construct No. P-050215

Dear Mr. Smith:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050215 to Poe Asphalt Paving, Inc. in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on November 28, 2005. This permit is effective immediately and replaces PTC No. 777-00084, issued on March 26, 1993, the terms and conditions of which no longer apply. This permit does not release the permittee from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Lewiston Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer

Martin Bauer, Administrator
Air Quality Division

MB/DP/bf
Enclosures

Permit No. P-050215

Air Quality **PERMIT TO CONSTRUCT** **State of Idaho** **Department of Environmental Quality**	**PERMIT No.:** P-050215 **FACILITY ID No.:** 777-00084 **AQCR:** Portable **CLASS:** SM **SIC:** 2951 **ZONE:** Portable **UTM COORDINATE (km):** Portable

1. PERMITTEE
Poe Asphalt Paving, Inc.

2. PROJECT
Portable Hot-Mix Asphalt Plant, Cedarapids #1900

3. MAILING ADDRESS 302 15th Street	**CITY** Clarkston	**STATE** Washington	**ZIP** 99403
4. FACILITY CONTACT Josh Smith	**TITLE** Highway Division Manager	**TELEPHONE** (509) 758-5561	
5. RESPONSIBLE OFFICIAL Josh Smith	**TITLE** Highway Division Manager	**TELEPHONE** (509) 758-5561	
6. EXACT PLANT LOCATION Portable		**COUNTY** Portable	

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Production of hot-mix asphalt

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 28, 2006

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Acronyms, Units, and Chemical Nomenclature

ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
gal/hr	gallons per hour
gr/dscf	grains per dry standard cubic foot
HMA	hot-mix asphalt
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
LPG	liquefied petroleum gas
MMBtu/hr	million British thermal units per hour
NOx	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PERF	portable equipment registration and relocation form
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PCB	polychlorinated biphenyl
PTC	permit to construct
RAP	recycled asphalt pavement
SIC	Standard Industrial Classification
SO_2	Sulfur dioxide
TOC	Total organic carbon
T/hr	tons per hour
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	Volatile organic compound

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This permit to construct (PTC) replaces PTC 777-00084, dated March 26, 1993, for the Poe Asphalt Paving, Inc. (Poe) Cedarapids #1900 portable hot-mix asphalt (HMA) plant. The purpose of the new permit is to allow the use of additional fuel types for the drum dryer and asphalt tank heater.

Regulated Sources

Table 1.1 lists all sources of emissions that are regulated in this PTC.

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Hot-mix Asphalt Drum Dryer Manufacturer: Cedarapids/CMI Model: 100-48 CF/PTD 400 Manufacture Date: 1993 Type of HMA plant: Portable, Counterflow drum mix Max. hot-mix asphalt production rate: 550 T/hr Design aggregate: Up to 50% RAP HMA burner permitted fuel types: Natural gas, liquefied petroleum gas (LPG), propane, ASTM Grade 2 fuel oil, and used oil or Grade 4 reprocessed fuel oil (RFO4) at 0.75% sulfur. Drum dryer rated heat input capacity: 97 MMBtu/hr	Baghouse: Manufacturer: CMI Model : CMI 318
2	Asphalt Tank Heater Manufacturer: Astec/CEI Model: CEI-1800 Type: Circulating hot oil heater with power flame burner (indirect heat) Permitted Fuel Type(s): Natural gas or ASTM Grade 2 fuel oil Rated heat input capacity: 2.115 MMBtu	None
2	Generator Engine Manufacturer: Caterpillar Model: 3412 Permitted Fuel Type(s): ASTM Grade 2 Fuel oil Rating: 800 kW	None

2. HOT-MIX ASPHALT PLANT

2.1 Process Description

Electrical power is provided by a connection to the local grid or may be provided using a portable generator engine that may be fueled by ASTM Grade 2 fuel oil (#2 diesel).

Asphalt cement is stored in an aboveground storage tank, kept in a liquid state using a tank heater that may be fueled by ASTM Grade 2 fuel oil (#2 diesel) or natural gas.

Stockpiled aggregate is transferred to feed bins. Aggregate is dispensed from the bins onto feeder conveyors, which transfer the aggregate to the drum mix dryer. Aggregate travels through the rotating drum dryer, the aggregate may consist of up to 50% recycled asphalt. When dried, the aggregate is mixed with liquid asphalt cement. The resulting hot-mix asphalt (HMA) is then conveyed to hot storage bins until it can be loaded into trucks for transport off site or transferred to silos for temporary storage.

2.2 Emissions Control Description

Particulate matter (PM) emissions from the hot-mix asphalt drum dryer are controlled by a baghouse.

3. STATEWIDE REQUIREMENTS

The permittee shall comply with the following conditions when the portable hot-mix asphalt plant is operated anywhere (in attainment or unclassifiable areas) within the state of Idaho.

Emissions Limits

3.1 Opacity Limit (NSPS)

Visible emissions from the drum dryer shall not exhibit 20% opacity or greater in accordance with 40 CFR 60.92(a)(2). Opacity shall be determined using EPA Method 9.

3.2 Opacity Limit (IDAPA)

Emissions from any stack, vent, or other functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

3.3 Drum Dryer PM Grain Loading Emissions Limits (NSPS)

Particulate matter (PM) emissions from the drum dryer shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf) in accordance with 40 CFR Part 60.92(a)(1).

3.4 Pollutant Emissions Limits

- Criteria Pollutants. The PM_{10} emissions from the drum dryer stack shall not exceed any corresponding emissions rate limits listed in Table 3.1.

Table 3.1 DRUM DRYER STACK EMISSIONS LIMITS

Source Description	PM_{10}	
	lb/hr[a]	T/yr[b]
Drum Dryer Stack	15.2	4.6

[a] lb/hr = pounds per hour
[b] T/yr = tons per consecutive 12-month period

Operating Requirements

3.5 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.

- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

3.6 Permitted Fuels

- The fuel used in the hot-mix drum dryer shall be ASTM Grade 2 fuel oil, used oil, Grade 4 reprocessed fuel oil (RFO4), natural gas, liquefied petroleum gas (LPG), or propane.
- The fuel used in the asphalt tank heater shall be ASTM Grade 2 fuel oil or natural gas.
- The fuel used in the electric generator engine shall be ASTM Grade 2 fuel oil.

3.7 Used Oil Fuel Specifications

In accordance with 40 CFR 279.11, with the exception of total halogens which are limited to 1,000 ppm, used oil burned for energy recovery shall not exceed any of the allowable levels listed in Table 3.2. In addition, used oil shall not contain a quantifiable level (2 ppm) of polychlorinated biphenyls (PCBs).

Table 3.2 USED OIL SPECIFICATIONS[1]

Constituent/property	Allowable level
Arsenic	5 ppm[2] maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash point	100 deg. F minimum
Total halogens	1,000 ppm maximum
PCBs[3]	< 2 ppm

[1] The specification does not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see 40 CFR 279.10(b)).
[2] parts per million
[3] Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e)

3.8 Fuel Oil and Used Oil Sulfur Content Limit

- No ASTM Grade 2 fuel oil containing sulfur in excess of 0.5% by weight shall be burned in the drum dryer, asphalt tank heater, or generator engine.
- No used oil or RFO4 fuel oil containing sulfur in excess of 0.75% by weight shall be burned in the drum dryer.

3.9 Hot-Mix Asphalt Production Limits

- The production rate of the asphalt plant shall not exceed a maximum of 13,200 tons of HMA per day.
- The production rate of the asphalt plant shall not exceed a maximum of 400,000 tons of HMA per any consecutive 12-month period.

- Tons per day of recycled asphalt pavement fed as part of the design aggregate shall not exceed 50 percent of the total HMA production in tons per day or 6,600 tons per day, whichever is less.

3.10 Baghouse Monitoring Equipment

The permittee shall, in accordance with manufacturer specifications, install, calibrate, maintain, and operate equipment to continuously measure the pressure differential across the hot-mix asphalt drum dryer baghouse.

3.11 Operations and Maintenance Manual

Within 60 days of permit issuance, the permittee shall have developed an O&M manual for the baghouse, which controls the PM and PM_{10} emissions from the hot-mix asphalt drum dryer. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. The manual shall contain, at a minimum, the pressure drop range for the baghouse, and requirements for monthly inspections of the baghouse during each month of operation. The inspections shall include but not be limited to checking the bags for structural integrity and that they are appropriately secured in place. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.12 Pressure Drop Across the Baghouse

The pressure drop across the baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.13 Collocation

The hot-mix asphalt plant shall not collocate with any other hot-mix asphalt plant.

Monitoring and Recordkeeping Requirements

3.14 Operating Parameters

The following parameters shall be monitored and recorded. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Pressure drop across the baghouse once weekly when the drum dryer is operating;
- Date and results of monthly baghouse inspections;
- Hot-mix asphalt production in tons per day, tons per month and tons per any consecutive 12 month period (tons per year);
- Tons of recycled asphalt used per day; and

3.15 Reasonable Control Measures

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each fugitive emissions inspection and a description of the following: the

permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken. The monthly inspection is not required when the facility is not in operation.

Records of each facility-wide fugitive emissions inspection shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.16 Visible Emissions Monitoring

The permittee shall conduct an inspection of visible emissions from the hot-mix drum dryer baghouse stack during daylight hours and under normal operating conditions once during each calendar month that the drum dryer operates. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the hot-mix drum dryer baghouse stack, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with excess emissions regulations contained in IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. The monthly visible emissions inspection is not required when the facility is not in operation.

Records of each visible emissions inspection shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.17 Performance Testing Requirements

3.17.1 Within 60 days after achieving the maximum production rate at which the hot-mix asphalt facility will operate but not later than 180 days after initial start up of the source, a performance test shall be conducted on the hot-mix drum dryer under worst-case normal operating conditions in accordance with IDAPA 58.01.01.157, General Provision 6 of this permit, and in accordance with 40 CFR 60.90 if the initial source test for an affected facility has not been conducted in accordance with that regulation. The performance test shall be conducted to demonstrate compliance with the applicable PM standards defined in 40 CFR 60.92 and the pound per hour PM_{10} emissions standard of Permit Condition 3.4 of this permit. The following shall be monitored and recorded during the performance tests:

- The hourly production rate of the hot-mix drum dryer expressed as tons per hour,
- The pressure drop across the baghouse, and
- The visible emissions observed during the performance tests.

3.17.2 The permittee shall conduct performance tests at a frequency of no less than once every five years to demonstrate compliance with the 0.04 grains of PM per dry standard cubic foot (gr/dscf) emissions limit, the pound per hour PM_{10} emissions limit of Section 3.4 of this permit and the 20% opacity emissions limits of Permit Conditions 3.1 and 3.2 of this permit.

3.18 Used Oil Fuel Certification

The permittee shall demonstrate compliance with the used oil fuel specifications in Permit Condition 3.7 by obtaining a used oil fuel certification from the used oil fuel supplier on an as-received basis or by having the fuel analyzed by a qualified laboratory. The certification shall include the following information:

- The name and address of the used oil supplier;
- The measured concentration, expressed as ppm, of each constituent listed in Table 3.2;
- The flash point of the used oil expressed as degrees Fahrenheit;
- The analytical method or methods used to determine the concentration of each constituent and property (flash point) listed in Table 3.2;
- The date and location of each sample; and
- The date of each certification analysis.

Records of each certification shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.19 Sulfur Content Monitoring

The permittee shall maintain purchase records or equivalent from the supplier that show the sulfur content of the fuel oil delivered to the facility on an as-received basis. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

Reporting Requirements

3.20 Relocation

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a scaled plot plan and a complete Portable Equipment Registration and Relocation Form (PERF, available on the DEQ website at www.state.id.us/deq/air/equip_relocat.htm), in accordance with IDAPA 58.01.01.500, to the following address:

PERF Processing Unit
DEQ – Air Quality
1410 N. Hilton
Boise, ID 83706-1255

4. OPERATIONS IN PM_{10} NONATTAINMENT AREAS

Under this permit, the permittee shall not locate the portable HMA plant in any PM_{10} nonattainment area. Contact DEQ for current nonattainment area status and more specific details about the nonattainment area boundaries.

Prior to operation in any PM_{10} nonattainment area, Poe Asphalt Paving, Inc. shall submit an air quality permit to construct application that requests the ability to locate and operate the portable HMA plant within a PM_{10} nonattainment area.

5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

3. The permittee shall allow the director, and/or the authorized representative(s), upon the presentation of credentials:

   - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
   - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the director.

4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

5. The permittee shall notify DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:

   - A notification of the date of initiation of construction, within five working days after occurrence;
   - A notification of the date of completion/cessation of construction, within five working days after occurrence;
   - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
   - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
   - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence – production rate and date.

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.