

Statement of Basis

**Permit to Construct No. P-2014.0005
Project ID 61337**

**Inland Asphalt Co. - 777-00303
Portable, Idaho**

Facility ID 777-00303

Facility Review

**June 17, 2014
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The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance

O ₂	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Inland Asphalt Co. has proposed to revise the permit of an existing portable drum-mix asphalt plant. The asphalt plant consists of a counter-flow asphalt drum mixer equipped with a bag house to control particulate matter, and materials transfer equipment. Materials transfer equipment at the facility will include front end loaders, feed bins, storage silos, conveyors, stock piles, and haul trucks.

Asphalt is made at the facility as follows. First, stockpiled aggregate is transferred to feed bins. Aggregate is then dispensed from the feed bins onto feeder conveyors, which transfer the aggregate to the asphalt drum mixer. The Applicant has requested that the asphalt drum mixer be fired on natural gas, LPG/propane, #2 diesel fuel, and used oil (RFO). Next, aggregate travels through the rotating drum mixer, and when dried and heated, it is mixed with hot liquid asphaltic oil. The asphaltic oil is heated by the asphalt tank heater to allow it to flow and be mixed with the hot, dry aggregate. The resulting asphalt is conveyed to hot storage bins until it can be loaded into trucks for transport off-site or transferred to silos for temporary storage prior to transport off-site. As part of the operation, the Applicant has proposed that a portable rock crusher be allowed to be collocated at the facility.

The Applicant has proposed that line power and portable electrical generators will be used at the facility. Therefore, IC engines powering electrical generators were included in the application.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

August 14, 2006	P-060115, Permit modification to allow the combustion of fuel oil and used oil in the drum dryer, Permit status (A, but will become S upon issuance of this permit)
June 13, 2002	777-00303, Initial permit for a portable HMA plant, Permit status (S)

Application Scope

This is a permit revision to change out the existing baghouse for a new baghouse with the same PM₁₀ control specifications. In addition, the facility is specifying a newer Tier 2 certified IC engine powering an electrical generator for when line power is not available.

Application Chronology

March 4, 2014	DEQ received an application, an application fee, and the permit processing fee.
April 2, 2014	DEQ determined that the application was complete.
May 1, 2014	DEQ made available the draft permit and statement of basis for applicant review as well as peer and regional office review.
June 17, 2014	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

The asphalt production facility utilizes a baghouse for control of particulate matter emissions from the asphalt drum mixer. In addition, the use emissions controls to minimize PM₁₀ emissions from aggregate handling.

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
Materials Handling	<u>Material Transfer Points:</u> Materials handling Asphalt aggregate transfers Truck unloading of aggregate Aggregate conveyor transfers Aggregate handling	Fugitive Emissions Controls	N/A
Hot Mix Asphalt Drum Mixer	<u>Asphalt Drum Mixer:</u> Manufacturer: Cedarapids Model: 8830 Type: Counter-flow Max. production: 350 T/hr and 373,616 T/yr Fuel(s): Natural gas, LPG/propane, #2 fuel oil, and used oil (RFO) Sulfur content: 0.5% by weight	<u>Asphalt Drum Mixer Baghouse:</u> Manufacturer: Cedarapids Model: 11060-P Type: Reverse pulse-jet Flow rate: 20,842 dscf PM ₁₀ control efficiency: 99%	Exit height: 24.0 ft (7.3 m) Exit diameter: 4.3 ft (1.3 m) Exit flow rate: 20,842 acfm Exit temperature: 150.0 °F (65.6 °C)
IC Engine	<u>IC Engine:</u> Manufacturer: Caterpillar Model: C27 Manufacture Date: 2007 Max. power rating: 1,214 bhp Fuel: ULSD diesel Sulfur content: 0.0015% by weight Annual operational limit: 1,067 hrs/yr (in non-attainment areas)	N/A	Not previously modeled

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

For this permit revision emissions calculations were not performed as it was assumed emissions were staying the same or decreasing as a result of this project. The facility is currently permitted at 5.75 lb-PM₁₀/hr and 3.07 T/yr.

Ambient Air Quality Impact Analyses

An Ambient Air Quality Impact Analysis was not performed for this project because it was assumed emissions were staying the same or decreasing as a result of this project.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

This HMA plant is currently permitted to operate as portable throughout the state and it was previously allowed to operate in non-attainment areas with certain limitations. These requirements will be included with this new permit because as discussed previously a modeling analysis was not performed for this project. These previous permit requirements are included as Permit Conditions 2.6 and 3.5.

Facility Classification

This facility was previously classified as "Synthetic Minor" for PM₁₀ emissions because PM₁₀ emissions would exceed 100 tons per year without controls or enforceable permit limits. There is no change in permitted emissions as a result of this project. Therefore, this facility will continue to be classified as "Synthetic Minor" for PM₁₀ emissions.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201

Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401

Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400-410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625

Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.5 and 3.3.

Fugitive Emissions (IDAPA 58.01.01.650)

IDAPA 58.01.01.650

Rules for the Control of Fugitive Emissions

The sources of fugitive emissions at this facility are subject to the State of Idaho fugitive emissions standards. These requirements are assured by Permit Conditions 1.2, 1.3, and 1.7.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)

IDAPA 58.01.01.701

Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment's process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following four equations:

IDAPA 58.01.01.701.01.a: If PW is < 9,250 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.701.01.b: If PW is $\geq 9,250$ lb/hr; $E = 1.10 (PW)^{0.25}$

For equipment that commenced prior to October 1, 1979, the PM allowable emission rate is based on one of the following equations:

IDAPA 58.01.01.702.01.a: If PW is < 17,000 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.702.01.b: If PW is $\geq 17,000$ lb/hr; $E = 1.12 (PW)^{0.27}$

For the existing asphalt drum mixer emissions unit proposed to be installed as a result of this project with a proposed throughput of 42.7 T/hr (1,024 T/hr \div 24 hr/day), E is calculated as follows:

Proposed throughput = 42.7 T/hr x 2,000 lb/1 T = 85,333 lb/hr

Therefore, E is calculated as:

$E = 1.10 \times PW^{0.25} = 1.10 \times (85,333)^{0.25} = 18.8$ lb-PM/hr

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 5.75 lb-PM₁₀/PM_{2.5} per hour. Assuming PM is 50% PM₁₀/PM_{2.5} means that PM emissions will be 11.5 lb-PM/hr (5.75 lb- PM₁₀/PM_{2.5} per hour \div 0.5 lb-PM₁₀/PM_{2.5} per lb-PM). This is less than the calculated Rule requirement PM emissions rate of 18.8 lb-PM/hr. Therefore, compliance with this requirement has been demonstrated.

Rules for Control of Odors (IDAPA 58.01.01.775)

IDAPA 58.01.01.750

Rules for Control of Odors

Section 776.01 states that no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution. These requirements are assured by Permit Conditions 1.6 and 1.9.

Rules for Control of Hot-Mix Asphalt Plants (IDAPA 58.01.01.805)

IDAPA 58.01.01.805

Rules for Control of Hot-Mix Asphalt Plants

The purpose of Sections 805 through 808 is to establish for hot-mix asphalt plants restrictions on the emission of particulate matter.

Section 806 states that no person shall cause, allow or permit a hot-mix asphalt plant to have particulate emissions which exceed the limits specified in Sections 700 through 703. As demonstrated previously, these requirements have been met by the proposed PM₁₀ emissions rate (see Section on Particulate Matter – New Equipment Process Weight Limitations).

Section 807 states that in the case of more than one stack to a hot-mix asphalt plant, the emission limitation will be based on the total emission from all stacks. The proposed facility only has one stack for emissions from the asphalt drum dryer so there is no need to combine emissions limits from multiple stacks into one stack as required.

Section 808.01 requires fugitive emission controls as follows: No person shall cause, allow or permit a plant to operate that is not equipped with an efficient fugitive dust control system. The system shall be operated and maintained in such a manner as to satisfactorily control the emission of particulate material from any point other than the stack outlet.

Section 808.02 requires plant property dust controls as follows: The owner or operator of the plant shall maintain fugitive dust control of the plant premises and plant owned, leased or controlled access roads by paving, oil treatment or other suitable measures. Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as stockpiling, screen changing and general maintenance.

These requirements are assured by Permit Conditions 1.2 and 1.3.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for any criteria pollutant or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as determined previously for initial permit 777-00303. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21

Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b)(1). Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

Because the facility produces asphalt and has a compression ignition IC engine the following NSPS Subparts are applicable:

- 40 CFR 60, Subpart I - National Standards of Performance for Hot Mix Asphalt Plants
- 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Those sections that are applicable are highlighted.

40 CFR 60, Subpart I

National Standards of Performance for Hot Mix Asphalt Plants

This permitting action is for an existing asphalt plant. Therefore, the requirements of this subpart apply.

§ 60.90

Applicability and designation of affected facility

In accordance with §60.90(a), each hot mix asphalt facility is an affected facility. In accordance with §60.90(b), any hot mix asphalt facility that commences construction or modification after June 11, 1973 is subject to the requirements of Subpart I.

The affected facility includes: the dryer; systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems.

§ 60.91 Definitions

This section contains the definitions of this subpart.

§ 60.92 Standard for particulate matter

In accordance with §60.92, no owner or operator shall discharge or cause the discharge into the atmosphere from any affected facility any gases which contain particulate matter in excess of 0.04 gr/dscf or exhibit 20% opacity or greater. Permit Condition 2.4 includes the requirements of this section.

§ 60.93 Test methods and procedures

In accordance with §60.93(a), performance tests shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60.

In accordance with §60.93(b), compliance with the particulate matter standards shall be determined by EPA Reference Method 5, and opacity shall be determined by EPA Reference Method 9. This is an existing HMA plant that was permitted in 2002 and the initial Subpart I source test has been performed on this asphalt plant. Therefore, no initial Subpart I source test is required of this asphalt plant.

40 CFR 60, Subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This permitting action is for an existing asphalt plant. Included in the proposed permitted equipment is a diesel-fired IC engine. Therefore, the requirements of this subpart may apply.

§ 60.4200 Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:

(i) 2007 or later, for engines that are not fire pump engines,

(ii) The model year listed in table 3 to this subpart or later model year, for fire pump engines.

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005 where the stationary CI ICE are:

(i) Manufactured after April 1, 2006 and are not fire pump engines, or

(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

(3) Owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005.

(4) The provisions of §60.4208 of this subpart are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005.

(b) The provisions of this subpart are not applicable to stationary CI ICE being tested at a stationary CI ICE test cell/stand.

(c) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

(d) Stationary CI ICE may be eligible for exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C (or the exemptions described in 40 CFR part 89, subpart J and 40 CFR part 94, subpart J, for engines that would need to be certified to standards in those parts), except that owners and operators, as well as manufacturers, may be eligible to request an exemption for national security.

(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

This facility includes the installation of a CI stationary IC that was manufactured after April 1, 2006, and that is not a fire pump engine.

§ 1068.30 Defines a “non-road” engine as follows:

(1) Except as discussed in paragraph (2) of this definition, a nonroad engine is an internal combustion engine that meets any of the following criteria:

(i) It is (or will be) used in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers).

(ii) It is (or will be) used in or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers).

(iii) By itself or in or on a piece of equipment, it is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

(2) An internal combustion engine is not a nonroad engine if it meets any of the following criteria:

(i) The engine is used to propel a motor vehicle, an aircraft, or equipment used solely for competition.

(ii) The engine is regulated under 40 CFR part 60, (or otherwise regulated by a federal New Source Performance Standard promulgated under section 111 of the Clean Air Act (42 U.S.C. 7411)).

(iii) The engine otherwise included in paragraph (1)(iii) of this definition remains or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year. See §1068.31 for provisions that apply if the engine is removed from the location.

The facility has requested that they may be a non-road engine. Therefore, Permit Condition 3.7 was included to specify what a non-road IC engine is and that NSPS Subpart IIII does not apply if it meets this definition.

§ 60.4201

Emissions Standards for Manufacturers

This Section of the Subpart applies to manufacturers of IC engines. However, the Applicant is not a manufacturer of the IC engines proposed for this project. Therefore, the requirements of this Section of the Subpart are not applicable.

(d) If you are an owner or operator and must comply with the emission standards specified in §60.4204(c) or §60.4205(d), you must demonstrate compliance according to the requirements specified in paragraphs (d)(1) through (3) of this section.

(1) Conducting an initial performance test to demonstrate initial compliance with the emission standards as specified in §60.4213.

(2) Establishing operating parameters to be monitored continuously to ensure the stationary internal combustion engine continues to meet the emission standards. The owner or operator must petition the Administrator for approval of operating parameters to be monitored continuously. The petition must include the information described in paragraphs (d)(2)(i) through (v) of this section.

(i) Identification of the specific parameters you propose to monitor continuously;

(ii) A discussion of the relationship between these parameters and NO_x and PM emissions, identifying how the emissions of these pollutants change with changes in these parameters, and how limitations on these parameters will serve to limit NO_x and PM emissions;

(iii) A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations;

(iv) A discussion identifying the methods and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and

(v) A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters.

(3) For non-emergency engines with a displacement of greater than or equal to 30 liters per cylinder, conducting annual performance tests to demonstrate continuous compliance with the emission standards as specified in §60.4213.

(e) If you are an owner or operator of a modified or reconstructed stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(e) or §60.4205(f), you must demonstrate compliance according to one of the methods specified in paragraphs (e)(1) or (2) of this section.

(1) Purchasing, or otherwise owning or operating, an engine certified to the emission standards in §60.4204(e) or §60.4205(f), as applicable.

(2) Conducting a performance test to demonstrate initial compliance with the emission standards according to the requirements specified in §60.4212 or §60.4213, as appropriate. The test must be conducted within 60 days after the engine commences operation after the modification or reconstruction.

(f) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

By installing Tier certified 2007 or later model year IC engines, as proposed by the Applicant, the emissions requirements of this Section of the Subpart have been met. These requirements are assured by Permit Condition 3.4.

§ 60.4212

What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?

Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

However, the Applicant is not required to source test the IC engines proposed for this project because they are Tier certified. Therefore, the requirements of this Section of the Subpart are not applicable.

§ 60.4213

What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of greater than or equal to 30 liters per cylinder?

Owners and operators of stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder must conduct performance tests according to paragraphs (a) through (f) of this section.

However, as discussed previously the Applicant is not required to source test the IC engines proposed for this project because they are Tier certified. Therefore, the requirements of this Section of the Subpart are not applicable.

§ 60.4214

What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?

(a) Owners and operators of non-emergency stationary CI ICE that are greater than 2,237 KW (3,000 HP), or have a displacement of greater than or equal to 10 liters per cylinder, or are pre-2007 model year engines that are greater than 130 KW (175 HP) and not certified, must meet the requirements of paragraphs (a)(1) and (2) of this section.

(1) Submit an initial notification as required in §60.7(a)(1). The notification must include the information in paragraphs (a)(1)(i) through (v) of this section.

(i) Name and address of the owner or operator;

(ii) The address of the affected source;

(iii) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;

(iv) Emission control equipment; and

(v) Fuel used.

(2) Keep records of the information in paragraphs (a)(2)(i) through (iv) of this section.

(i) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(ii) Maintenance conducted on the engine.

(iii) If the stationary CI internal combustion is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards.

(iv) If the stationary CI internal combustion is not a certified engine, documentation that the engine meets the emission standards.

(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached

The IC engine proposed to be installed by the Applicant is a Tier certified 2007 or later model year IC engine. Therefore, the requirements of this Section of the Subpart are not applicable.

§ 60.4218

What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§60.1 through 60.19 apply to you.

These requirements are assured by Permit Condition 3.12.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

Because the facility has a compression ignition IC engine the following NESHAP Subpart may be applicable:

- 40 CFR 60, Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

However, as discussed previously in the NSPS Applicability (40 CFR 60) section, Subpart IIII applies to the proposed Tier certified IC engine. Therefore, the requirements of NESHAP Subpart ZZZZ do not apply to the IC engine proposed for this project.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Permit condition 1.1 establishes the permit to construct scope.

Permit condition 1.3 explains which previous permit for the facility is being replaced as a result of this project.

Permit condition, Table 1.1, provides a description of the purpose of the permit and the regulated sources, the process, and the control devices used at the facility.

Facility-Wide Conditions

As discussed previously, permit condition 1.4 establishes that the permittee shall take all reasonable precautions to prevent fugitive particulate matter (PM) from becoming airborne and provides examples of the controls in accordance with IDAPA 58.01.01.650-651.

As discussed previously, permit condition 1.5 establishes that the asphalt plant shall employ efficient fugitive dust controls and provides examples of the controls in accordance with IDAPA 58.01.01.808.01 and 808.02.

Permit condition 1.6 establishes that the asphalt plant may collocate with one rock crushing plant, when operating in PM₁₀ attainment areas, and shall not locate with 1,000 ft. of another rock crushing plant, any other asphalt plant, or a concrete batch plant as requested by the Applicant. This requirement was carried over from the previous permit.

Permit condition 1.7 establishes that the permittee notify DEQ when the permitted portable equipment is relocated. This requirement is based upon imposing reasonable permit conditions for portable asphalt plants.

Permit condition 1.8 establishes that there are to be no emissions of odorous gases, liquids, or solids from the permit equipment into the atmosphere in such quantities that cause air pollution.

As discussed previously, permit condition 1.9 establishes that the permittee shall monitor fugitive dust emissions on a daily basis to demonstrate compliance with the facility-wide permit requirements.

Permit condition 1.10 establishes that the permittee measure and record the distances to equipment that will be collocated with the asphalt plant to demonstrate compliance with the Collocation Restrictions permit condition.

Permit condition 1.11 establishes that the permittee monitor and record odor complaints to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 1.12 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

Asphalt Production Equipment

Permit condition 2.1 provides a process description of the asphalt production process at this facility.

Permit condition 2.2 provides a description of the control devices used on the asphalt production equipment at this facility.

Permit condition 2.3 establishes hourly and annual emissions limits for PM₁₀ emissions from the asphalt production operation at this facility. This requirement was carried over from the previous permit.

As discussed previously permit condition 2.4 incorporates the particulate matter and opacity standards of 40 CFR 60, Subpart I – Standards of Performance for Hot Mix Asphalt Plants.

As discussed previously, Permit Condition 2.5 establishes a 20% opacity limit for the asphalt drum mixer baghouse stack, the asphaltic oil tank heater stack, the load-out station stack(s), and the silo filling slat conveyor stacks or functionally equivalent openings associated with the asphalt production operation.

Permit Condition 2.6 establishes a daily and an annual asphalt production limit for the asphalt production operation as proposed by the Applicant. This requirement was carried over from the previous permit.

Permit Condition 2.7 establishes limits for the raw materials used in the asphalt production operation as proposed by the Applicant. This condition was taken from the HMA General permit and placed in the permit at the request of the Applicant since they have always used RAP.

Permit Condition 2.8 establishes that a baghouse be used to control emissions from the asphalt drum mixer as proposed by the Applicant.

Permit Condition 2.9 establishes fuel use restrictions for combustion in the asphalt drum mixer based upon 40 CFR 279.11. These fuel use restrictions were based on the fuels proposed by the Applicant to be combusted in the asphalt drum mixer.

Permit Condition 2.10 establishes PM₁₀ performance testing requirements required by DEQ on asphalt plants located in the state of Idaho. This permit condition, and permit condition 2.11, were included in the permit to standardize the testing procedures used on all new and modified HMA plants. Because this plant had no previous PM_{2.5} limit and PM_{2.5} emissions were not modeled for this permit revision, the option to perform PM_{2.5} testing was removed from the standard performance testing condition.

Permit Condition 2.11 establishes PM₁₀ performance testing methods and procedures required by DEQ on asphalt plants located in the state of Idaho.

Permit condition 2.12 establishes that the permittee monitor asphalt production, visible emissions, RAP percentage usage, and the fuel combusted in the asphalt drum mixer during the performance tests to establish the validity of the performance tests.

Permit condition 2.13 establishes that the Permittee monitor and record daily asphalt production to demonstrate compliance with the Asphalt Production Limits permit condition.

Permit condition 2.14 establishes that the Permittee calculate and record RAP use to demonstrate compliance with the Allowable Raw Materials permit condition.

Permit condition 2.15 establishes that the Permittee shall establish procedures for operating the baghouse. This is a DEQ imposed standard requirement for operations using baghouses to control particulate emissions.

Permit condition 2.16 establishes that the permittee monitor distillate fuel oil shipments to demonstrate compliance with operating permit requirements.

Permit condition 2.17 establishes that the permittee monitor used oil fuel shipments to demonstrate compliance with the used oil fuel requirements of the permit.

Permit Condition 2.18 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

Permit Condition 2.19 establishes that the permittee shall submit the results of the performance tests to the appropriate DEQ office.

Permit condition 2.20 establishes that the federal requirements of 40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Plants, are incorporated by reference into the requirements of this permit per current DEQ guidance.

Permit Condition 2.21 incorporates 40 CFR 60, Subpart A – General Provisions.

Internal Combustion Engines

Permit condition 3.1 provides a process description of the IC engine process at this facility.

Permit condition 3.2 provides a description of the control devices used on the IC engine at this facility.

As discussed previously, Permit Condition 3.3 establishes a 20% opacity limit for the IC Engine exhaust stacks or functionally equivalent openings associated with the IC engine operation.

Permit condition 3.4 establishes that the IC engine shall be EPA Tier certified to the certification proposed by the Applicant.

Permit Condition 3.5 establishes a daily and an annual operation limit for the IC Engine as proposed by the Applicant. This requirement was carried over from the previous permit.

Permit Condition 3.6 establishes fuel use restrictions for combustion in the IC Engine. These fuel use restrictions were based on the fuel proposed by the Applicant to be combusted in the IC Engine.

Permit Condition 3.7 was included at the request of the Applicant in case the IC engine is moved to a different location every twelve months. This permit condition defines what a non-road IC engine is and explains that the requirements of NSPS Subpart do not apply to non-road IC engines.

As discussed previously, Permit Condition 3.8 establishes operation and maintenance requirements for the IC engine as required by 40 CFR 60, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.

As discussed previously, Permit Condition 3.9 establishes recordkeeping requirements of notifications and maintenance performed for the IC engine as required by 40 CFR 60, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.

As discussed previously, Permit Condition 3.10 establishes where the notifications for the IC engine as required by 40 CFR 60, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines should be sent.

Permit condition 3.11 establishes that the federal requirements of 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines are incorporated by reference into the requirements of this permit per current DEQ guidance.

Permit Condition 3.12 incorporates 40 CFR 60, Subpart A – General Provisions as required by 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

Permit condition 3.13 establishes that the permittee monitor and record daily operation of the IC Engine to demonstrate compliance with the IC Engine Operating Limits permit condition.

Permit condition 3.14 establishes that the permittee monitor and record fuel shipment information to demonstrate compliance with the IC Engine Fuel Specifications permit condition.

Permit Condition 3.15 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – PROCESSING FEE

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Inland Asphalt Co - 777-00303
Address: 5111 E Broadway
City: Spokane Valley
State: WA
Zip Code: 99212
Facility Contact: Jana McDonald, PE
Title: Environmental Engineer
AIRS No.: 777-00303

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- N** Did this permit require engineering analysis? Y/N
- N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 250.00		

Comments:

