



# **Air Quality Permitting Statement of Basis**

**October 21, 2004**

**Permit to Construct No. P-040411**

**Gordon Paving Company  
Twin Falls, Idaho**

**Facility ID No. 083-00005**

**Prepared by:**

**Bill Rogers, Regional Permit Program Coordinator**

**AIR QUALITY DIVISION**

**FINAL REVISED PERMIT**

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## Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator

## 1. PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

Gordon Paving Company (Gordon Paving) has submitted a PTC application to revise facility information with regard to their Twin Falls hot-mix asphalt plant. Specifically, Gordon Paving requests that the name of the facility contact person and the facility's mailing and physical address be changed to reflect current operations. A modification has not been requested and emissions are not increasing. This permitting action is a revision to a PTC (IDAPA 58.01.01.209.04). Because emissions are not increasing, an opportunity for public comment is not required.

## 2. FACILITY DESCRIPTION

Gordon Paving produces hot-mix asphalt that is used to pave roadways. Refer to previous technical memoranda for a complete facility description.

## 3. FACILITY / AREA CLASSIFICATION

Gordon Paving's hot-mix asphalt facility is not a major facility as defined by IDAPA 58.01.01.205. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is subject to NSPS requirements in accordance with 40 CFR 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*, because the hot mix asphalt facility was manufactured on or after June 11, 1973, the proposed date of the regulation. The SIC code defining the facility is 2951 (Asphalt Paving Mixtures and Blocks). The facility's potential to emit is limited below all major source thresholds; therefore, the AIRS facility classification is "SM".

The AIRS information provided in the Appendix defines the classification for each regulated air pollutant at Gordon Paving's Twin Falls facility. This required information is entered into the EPA AIRS database.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Twin Falls County which is unclassifiable for all criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone).

## 4. APPLICATION SCOPE

Gordon Paving requests to change the mailing and physical address for their Twin Falls hot-mix asphalt plant and also change the name of the facility contact. This information has been incorporated into the revised permit and is provided below for reference:

Mailing Address:	837 Madrona Street South	Twin Falls	ID	83301
Physical Address:	837 Madrona Street South	Twin Falls	ID	83301
Contact Person:	Terrance Hamblin	Safety/Compliance Director		208-733-1800

The facility's current permit has been revised to reflect current document formatting, regulatory citations (IDAPA 16.01.01 to IDAPA 58.01.01), and in some cases, the permit language has been reworded to clarify a permit condition. None of the language changes has changed the context of the original permit condition or made it more stringent.

**4.1 Application Chronology**

September 3, 2004 PTC application received at Twin Falls Regional Office  
September 30, 2004 PTC application determined complete  
November 3, 2004 Twin Fall Regional Office comments on permit. No changes required.

**5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this PTC action:

**5.1 Equipment Listing**

Refer to previous technical memoranda for a complete equipment listing.

**5.2 Emissions Inventory**

A new emissions inventory was not required for this permit revision – emissions are not increasing. Refer to previous technical memoranda for a complete emissions inventory.

**5.3 Modeling**

Modeling was not required because emissions are not increasing.

**5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04 ..... Revisions of Permits to Construct

This rule sets forth the requirements for a revision to a PTC. A revised may be issued so long as the facility continues to meet all applicable requirements in Sections 200 through 228. Correspondence between DEQs State Office and its Twin Falls Regional Office indicates the facility has been in compliance with its current permit, issued pursuant to IDAPA 58.01.01.200-228. Furthermore, emissions are not increasing as a result of the permit revision; therefore, an opportunity for public comment is not required.

**5.5 Fee Review**

In accordance with IDAPA 58.01.01.224 and 225, registration fees and processing fees are not required for a change in the name or ownership of the holder of a PTC.

**6. PERMIT CONDITIONS**

The permit conditions have not changed as a result of this permit revision.

**7. PUBLIC COMMENT**

An opportunity for public comment was not required in accordance with IDAPA 58.01.01.209.04 because emissions are not increasing.

**8. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that revised PTC No. P-040411 be issued to Gordon Paving Company for their hot-mix asphalt facility located in Twin Falls. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

BR/sd                      Permit No. P-040411

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## **APPENDIX**

**Gordon Paving Company  
Twin Falls, Idaho**

**PTC No. P-040411  
Twin Falls Hot-mix Asphalt Facility**

**Aerometric Information Retrieval System Information**

**AEROMETRIC INFORMATION RETRIEVAL SYSTEM INFORMATION**

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N-Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	B							U
PM <sub>10</sub>	SM						SM	U
PT (Particulate)	SM		SM				SM	U
VOC	B							U
THAP (Total HAPs)	B							U
			<b>APPLICABLE SUBPART</b>					
			I					