



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Curt Fransen, Director

April 20, 2012

C. Patrick McFarlane, Vice President
CPM Development Corp
5111 East Broadway
Spokane, WA 99212

RE: Facility ID No. 777-00225, CPM Development Corp, Plant #25, Portable
Final Permit Letter

Dear Mr. McFarlane:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0005 Project 60992 to CPM Development Corp to revise the permit for portable hot-mix asphalt plant #25. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received February 2, 2012.

This permit is effective immediately and replaces PTC No. P-040105, issued on June 28, 2004. This permit does not release CPM Development Corp from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information to the DEQ Coeur d'Alene Regional Office, 2110 Ironwood Parkway, Coeur d'Alene, ID 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other 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 contact Ken Hanna at (208) 373-0283 or kenneth.hanna@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSKH
Permit No. P-2012.0005 PROJ 60992
Enclosures

Air Quality
PERMIT TO CONSTRUCT

Permittee CPM Development Corp. 00225

Permit Number P-2012.0005

Project ID 60992

Facility ID 777-00225

Facility Location Portable

Permit Authority

This permit (a) is issued according to the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.200-228; (b) 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; (c) has been granted on the basis of design information presented with its application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (g) 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. Changes in design, equipment or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

Date Issued June 28 2004

Date Revised April 20, 2012



Ken Hanna, Permit Writer



Mike Simon, Stationary Source Manager

PERMIT SCOPE 3
HOT-MIX ASPHALT PLANT 4
GENERAL PROVISIONS 10

PERMIT SCOPE

Purpose

1. This is a revised permit to construct a portable hot-mix asphalt (HMA) plant.
2. Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right hand margin.
3. This PTC replaces Permit to Construct No. P-040105, issued on June 28, 2004.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Sources	Control Equipment
<u>Portable Hot-mix Asphalt Plant #25</u> HMA Plant Manufacturer: Cedar Rapids Drum Dryer Manufacturer: Gencor Drum Dryer Model No.: Ultradrum 400TPH Maximum Rated Throughput: 400 tons/hour, however allowable throughput is limited to 350 tons/hour based on a 24-hour average Fuel types: Natural Gas Propane Fuel Oil Used Oil Minimum Dryer Stack Height: 33 feet	Baghouse Manufacturer: Gencor Industries Model No.: CFP-182
600 kW Diesel Generator	None
75 kW Diesel Generator	None

HOT-MIX ASPHALT PLANT

Process Description

5. Process Description

The asphalt plant has a front-end loader to transfer stockpiled aggregate to five cold feed bins. Aggregate is dispensed from the bins onto slow moving feeder conveyors, sorted by a scalping screen for proportioned size gradations, and finally introduced to a drum mix dryer. Aggregate travels through the rotating drum counter-current to the heating media. The material is then heated and dried and mixed with liquid asphalt cement. The resulting hot mix asphalt (HMA) is then conveyed to hot storage bins until it can be loaded into dump trucks for transport off site. Recycled asphalt pavement (RAP) can be substituted in equal amounts for aggregate. The RAP process includes an additional bin, a lump breaker, and two conveyors. The plant uses natural gas, propane, fuel oil, and used oil as fuel for the asphalt plant dryer.

6. Control Descriptions

Table 2 PORTABLE HOT-MIX ASPHALT PLANT #25 DESCRIPTION

Emissions Units / Processes	Control Equipment
Portable Hot-mix Asphalt Plant	Baghouse
600 kW Diesel Generator	None
75 kW Diesel Generator	None

Emission Limits

7. Emission Limits

NO_x emissions from the drum dryer and the two electrical generators shall not exceed any corresponding emissions rate limits listed in the following table.

Table 3 HOT MIX ASPHALT PLANT #25 EMISSIONS LIMITS ^(a)

Sources	NO _x Emission Limits
	Tons/yr ^(b)
Drum Dryer	22.62
600 kW Generator	42.53
75 kW Generator	3.15
Total NO _x Emissions	68.30

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

b) Tons per any consecutive 12 calendar month period.

8. NSPS 40 CFR 60, Subpart I - Standards for Particulate Matter

Particulate matter (PM) emissions from the drum dryer baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the drum dryer, shall not exceed 20% opacity or greater as required by 40 CFR 60.92(a)(1) and (2).

9. NSPS 40 CFR 60, Subpart I - Standards for Particulate Matter

Gases from systems for screening, handling, storing, and weighing hot aggregate, including those affected facilities associated with the RAP process line, shall not contain PM emissions in excess of 0.04 grains per dry standard cubic foot (gr/dscf) nor shall not discharge into the atmosphere any gases which exhibit 20% opacity or greater as required by 40 CFR 60.92(a)(2).

10. **Opacity Limit**

Visible emissions from any point of emission associated with the hot-mix asphalt plant shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

11. **Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. 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 which 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, 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; or
- Prompt removal of earth or other stored material from streets, where practical.

12. **Dryer Burner Fuel**

The fuel supplied to the drum dryer shall be natural gas, liquefied petroleum gas (propane), ASTM Grade 1 fuel oil, ASTM Grade 2 fuel oil, or used oil. Any used oil supplied to the drum dryer shall meet the specifications in 40 CFR 279.11, with the exception of total halogens limited to 1,000 ppm, as provided in Permit Condition 13.

13. **Used Oil 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 of the constituents and property listed in Table 4.

Table 4 USED OIL SPECIFICATIONS¹

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

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

14. **Fuel Oil Sulfur Content Limits**

The sulfur content in the fuel oil supplied to the drum dryer shall not exceed the following limits as required by IDAPA 58.01.01.728:

- ASTM Grade 1 fuel oil – 0.3% by weight;
- ASTM Grade 2 fuel oil – 0.5% by weight;

15. **Used Oil Sulfur Content Limits**

The sulfur content in the used oil supplied to the drum dryer shall not exceed 0.5% by weight.

16. **Hot-mix Asphalt Production Limits**

The annual production of hot-mix asphalt from the facility shall not exceed 822,500 tons per consecutive 12-month period (T/yr). The daily production of hot-mix asphalt from the facility shall not exceed 8,400 tons per day (T/day).

[April 20, 2012]

17. **Monitoring Equipment**

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the baghouse.

18. **Air Pollution Control Equipment**

The baghouse shall be operated at all times during the operation of the drum dryer.

19. **Pressure Drop Across Air Pollution Control Device**

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

20. **Operations and Maintenance Manual Requirements**

Within 60 days after startup, the permittee shall have developed an O&M manual for the baghouse. The O&M manual shall describe the procedures that will be followed to comply with General Provision 30 and the baghouse operating requirements contained in this permit. The manual shall remain on site at all times and shall be available to DEQ representatives upon request.

21. **Performance Tests**

- Within 90 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial startup of the replacement dryer, the permittee shall conduct a performance test to measure opacity and particulate emissions from any affected facility as required by 40 CFR 60.92. The throughput to the affected facility(ies) shall be recorded in tons per hour (T/hr) during each performance test. Opacity shall be determined using procedures contained in IDAPA 58.01.01.625.04;
- The permittee shall conduct performance tests at a frequency of no less than once every five years to demonstrate compliance with both the 0.04 grains per dry standard cubic foot (gr/dscf) and the 20% opacity NSPS emission limits for Hot Mix Asphalt Plants;

[April 20, 2012]

22. **Generator Hours of Operation**

- The 600 kW generator shall not exceed 4,000 hours of operation per any consecutive 12-month period;
- The 75 kW generator shall not exceed 1,800 hours of operation per any consecutive 12-month period.

23. **Engine Specifications**

- The permittee shall utilize only nonroad engines as defined by 40 CFR 1068.30.
 - A nonroad engine is an internal combustion engine that meets the following criteria: 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.
 - An internal combustion engine is not a nonroad engine if it meets any of the following criteria: the engine 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.

[April 20, 2012]

Monitoring and Recordkeeping Requirements

24. **Operating Parameters Monitoring**

The permittee shall monitor and record the following information. Records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

- The pressure drop across the baghouse once per day when the hot-mix asphalt plant is operating to demonstrate compliance with Permit Condition 20.
- The hot-mix asphalt production annually to demonstrate compliance with Permit Condition 16. Annual production shall be determined by summing daily production monthly, and summing monthly production over the previous consecutive 12-month period (12 month rolling average).
- On days the plant is operated, the hot-mix asphalt production shall be recorded for that day to demonstrate compliance with the daily production rate limit in Permit Condition 16. The records shall also include information to show what days the plant was not operated.
- Hours of operation of the generators annually to demonstrate compliance with Permit Condition 22. Annual hours of operation shall be determined by summing monthly hours of operation over the previous consecutive 12-month period (12 month rolling average).

[April 20, 2012]

25. **Engine Location Monitoring**

The permittee shall maintain records of generator engine locations associated with the hot mix asphalt facility to ensure compliance with nonroad engine specifications (Permit Condition 23). The records shall include:

- A description of each location in which an engine is operated. The Portable Equipment Relocation Form may be used for the purposes of complying with this requirement (Permit Condition 29).
- For each location, the date any engine is located, relocated, or removed and the total time that all engines have operated at that location.

[April 20, 2012]

26. **Reasonable Control Measures Monitoring**

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control emissions from this facility. The record shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.), the frequency of application per day of operation, the amount applied, and the circumstances under which no controls are used. Records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[April 20, 2012]

27. **Fuel Oil Sulfur Content Limits Monitoring**

The permittee shall demonstrate compliance with the fuel oil sulfur content limits specified in Permit Conditions 14 and 15 by obtaining documentation of the sulfur content analysis for each shipment of fuel oil (ASTM Grade 1, ASTM Grade 2, used oil) on an as-received basis. Records of each fuel oil sulfur content analysis shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

[April 20, 2012]

28. **Used Oil Fuel Certification**

The permittee shall demonstrate compliance with the used oil fuel specifications in Permit Condition 13 by obtaining a used oil fuel certification from the used oil fuel supplier on an as-received basis. 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 4;
- 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 4;
- 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 five-year period and shall be made available to DEQ representatives upon request.

[April 20, 2012]

Reporting Requirements

29. **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 complete Portable Equipment Registration and Relocation Form in accordance with IDAPA 58.01.01.500, by including the following information:

- Exact location of the new site of operations;
- Startup date at the new site of operations and the duration of operations at the new site;
- Equipment to be used at the new site;
- A scaled plot plan clearly showing the property boundary of the new site; and
- Other permitted portable sources the unit will be collocated with at the new site of operations (i.e., hot-mix asphalt plant, cement plant, or rock crusher).

The Relocation Form is available at the following DEQ webpage (see bottom of page):

<http://www.deq.idaho.gov/permitting/air-quality-permitting/forms-checklists.aspx>

NONATTAINMENT AREA REQUIREMENTS

Operating Requirements

30. **Generator Hours of Operation Restriction**

The generators shall not be operated in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

GENERAL PROVISIONS

General Compliance

31. 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.

[Idaho Code §39-101, et seq.]

32. 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.

[IDAPA 58.01.01.211, 5/1/94]

33. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

34. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation

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

[IDAPA 58.01.01.211.02, 5/1/94]

36. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

37. 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, at its option, may 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.
38. 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.
39. Within 60 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.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

40. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

41. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

42. 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.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

43. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

44. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

45. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

46. 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.

[IDAPA 58.01.01.211, 5/1/94]