



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

June 26, 2002

CERTIFIED MAIL # 7099 3220 0006 2681 5596

Doyle Beck, President
ProWay Manufacturing & Repair Inc.
P.O. Box 1741
Idaho Falls, ID 83403

RE: AIRS Facility No. 777-00119, ProWay Manufacturing & Repair Inc., Idaho Falls
(Portable Hot-mix Asphalt Plant, Permit to Construct)

Dear Mr. Beck:

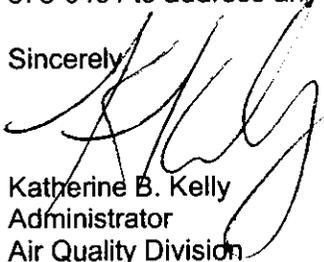
The Idaho Department of Environmental Quality (Department) is issuing amended Permit to Construct No. 777-00119 for your hot-mix asphalt plant in accordance with IDAPA 58.01.01.200 through 223, *Rules for the Control of Air Pollution in Idaho*. The enclosed permit is effective immediately and is based on the information in your permit application received September 8, 2001.

This permit does not release ProWay Manufacturing & Repair Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, and ordinances.

Jorge Garcia of the Idaho Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends that the following representatives of your firm also attend this meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, have the right to appeal this final agency action pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure Before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255 within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Dan Salgado, New Source Review Coordinator, at (208) 373-0431 to address any concerns you may have with the enclosed permit.

Sincerely,



Katherine B. Kelly
Administrator
Air Quality Division

KK/DH/bh Project No. P-010512 G:\AIR PERMITS\PT C\PROWAYMFG\P-010512 LETTER.DOC

Enclosures

cc: Joan Lechtenberg, Air Quality Division
Jorge Garcia, Idaho Falls Regional Office

Laurie Kral, EPA Region 10
Sherry Davis, Technical Services



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 777-00119

AQCR: CLASS: SM

SIC: 2951 ZONE:

UTM COORDINATE (km):

1. **PERMITTEE**
ProWay Manufacturing & Repair Inc.

2. **PROJECT**
Portable hot-mix asphalt plant

3. MAILING ADDRESS P.O. Box 1741	CITY Idaho Falls	STATE ID	ZIP 83403
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4. FACILITY CONTACT Doyle Beck	TITLE President	TELEPHONE (208) 528-8138
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5. RESPONSIBLE OFFICIAL Doyle Beck	TITLE President	TELEPHONE (208) 528-8138
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6. EXACT PLANT LOCATION Portable	COUNTY Portable
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7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Asphalt production

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 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 Idaho Department of Environmental Quality (Department) 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 is not transferable to another person, place, or piece or set of 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 26, 2002

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00119

Permittee: ProWay Manufacturing & Repair Inc.
Location: Portable

Date Issued: June 26, 2002

1. SOURCE

1.1 Process Description

The facility is a portable hot-mix asphalt (HMA) plant for the production of asphalt. The maximum plant output is 250 tons per hour (T/hr). The burner can be fired on either propane or diesel.

1.2 Controls

Fugitive emissions shall be reasonably controlled by, but not limited to, the application of water or environmentally safe chemical dust suppressants on all haul roads. The facility shall also be equipped with a venturi scrubber. The control efficiency of the scrubber shall be a minimum of 99.6%.

1.3 Equipment Listing

- Hetherington & Berner HMA plant
 - Model 5894
 - 250 T/hr capacity
- Associated aggregate process, handling, and transport equipment

1.4 Stack Parameters

The dryer exhaust stack shall meet the following specifications:

Height:	22 feet (minimum)
Diameter:	10.5 feet (maximum)
Flow rate:	40,000 actual cubic feet per minute (minimum)
Temperature:	180°F (minimum)

EMISSION LIMITS

1.5 Asphalt Dryer Emissions Limit

Emissions of particulate matter (PM) shall not exceed 0.04 grains per dry standard cubic foot as required in 40 CFR Part 60, Subpart I, nor shall PM, particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compound (VOC) emissions from the HMA dryer stack exceed any corresponding emission rate limit listed in the appendix of this permit.

1.6 Fugitive Emissions at Boundary Limits

Visible fugitive emissions shall not be observed leaving the property boundaries for a period or periods aggregating three minutes in any 60-minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

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1.7 Visible Emissions

Visible emissions emanating 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 as required in 40 CFR 60.92(a)(2) and in IDAPA 58.01.01.625. Opacity shall be determined using procedures contained in IDAPA 58.01.01.625.

OPERATING REQUIREMENTS

1.8 Maximum Production Rate

The maximum production rate of the HMA plant shall not exceed 250 T/hr or 180,000 tons per year (T/yr).

1.9 Operating Hours

The maximum hours of operation shall not exceed six hours per day or 720 hours per year, as per the applicant's submittal.

1.10 Venturi Scrubber Operating Parameters

- The pressure drop across the venturi scrubber shall remain within the manufacturer-recommended pressure drop range at all times, but shall not be less than 30% of the pressure drop recorded during the most recent performance test.
- The scrubbing water flow rate to the venturi scrubber shall not be less than 30% of the flow rate value recorded during the most recent performance test.

1.11 Fugitive Emissions

Fugitive particulate emissions from the operation of the HMA plant, traffic on haul roads, traffic areas, and all aggregate handling equipment shall be reasonably controlled as required in IDAPA 58.01.01.650, 58.01.01.651 and IDAPA 58.01.01.808.02. All emission units that emit fugitive particulate matter shall be equipped with an efficient fugitive dust control system in accordance with IDAPA 58.01.01.808.01.

Some of the efficient and reasonable controls may include, but are not limited to, the following:

- Use of water or chemicals
- Application of dust suppressants
- Use of control equipment
- Covering of open-bodied trucks
- Paving
- Prompt removal of earth or other stored material from streets, where practical

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1.12 Non-Attainment Area Operations

The facility shall not operate in PM₁₀ non-attainment areas or proposed PM₁₀ non-attainment areas without prior Departmental approval.

MONITORING REQUIREMENTS

1.13 Performance Test

The permittee shall conduct a performance test to measure PM emissions from the HMA plant exhaust stack in accordance with 40 CFR 60.90 and General Provision 6 of this permit. Visible emissions from the HMA plant exhaust stack shall be observed during this test using the methods specified in IDAPA 58.01.01.625.

The test shall be performed while the asphalt plant is operating at maximum capacity and the following shall be measured and recorded during the performance test:

- Tons per hour (T/hr) of asphaltic concrete produced
- Pressure drop across the venturi scrubber
- Water flow rate through the venturi scrubber
- Type of burner fuel and fuel flow rate (i.e., gallons per hour)
- Sulfur content of fuel (i.e., percent by weight)

1.14 Scrubber Pressure Monitoring and Recording

The permittee shall install, calibrate, maintain and operate a monitoring device for the continuous measurement of the pressure drop across the venturi scrubber. The pressure-monitoring device shall be certified by the manufacturer to be accurate within ± 1 inch of water gauge pressure and shall be calibrated on an annual basis in accordance with manufacturer instructions. The pressure drop across the scrubber shall be recorded at a minimum of once per day while the HMA plant is operating at normal capacity.

1.15 Scrubbing Media Flow

The permittee shall install, calibrate maintain and operate a monitoring device for the continuous measurement of the scrubbing water flow to the venturi scrubber throat. The water flow rate monitoring device shall be certified to be accurate within $\pm 5\%$ of the design scrubbing flow rate and shall be calibrated on an annual basis in accordance with manufacturer instructions. The scrubbing water flow rate shall be recorded at a minimum of once per day while the HMA plant is operating at normal capacity.

1.16 Operating Parameters

The following are to be monitored and recorded daily:

- Hourly production rate
- Hours of operation

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00119

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REPORTING REQUIREMENTS

1.17 Performance Test Protocol

The permittee shall submit a protocol for the performance test required in Permit Condition 1.13 to the Department for approval at least 30 days prior to the test date.

1.18 Performance Test Report

The permittee shall submit a written report of the asphalt plant performance test to the Department within 30 days after performing the test. The information required to be recorded in Permit Conditions 1.13.1 through 1.13.5 during the performance test shall also be submitted as part of the report.

1.19 Relocation

At least 10 days prior to relocation of any equipment and operations covered by this permit, the permittee shall report to the Department, on relocation forms supplied by the Department, the following information, in accordance with IDAPA 58.01.01.500:

- Location of the new site of operations
- Start-up date at the new site and the duration of operations at the new location
- Equipment to be used at the new site

1.20 Certification of Documents

All documents, including, but not limited to, records, monitoring data, supporting information, testing reports or compliance certifications submitted to the Department shall contain a certification by a responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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2. APPENDIX

ProWay Manufacturing & Repair Inc.

Hourly (lb/hr) and Annual (T/yr) Emission Limits^a

Source Description	PM/PM ₁₀		SO ₂		NO _x		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Dryer drum stack	10.0	3.6	36.5	13.1	14.0	5.0	9.5	3.4	7.0	2.5

^a As determined by a pollutant specific EPA reference method, Department-approved alternative, or as determined by the Department's emission estimation methods used in the permit application analysis
lb/hr - pounds per hour

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. 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:
 - 3.1 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.
 - 3.2 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 emissions 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 the Department, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If emissions testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.
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.