



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

July 22, 2011

John Hulet, Asphalt Foreman
HighStone Inc.
4362 N. Yellowstone Hwy.
Idaho Falls, ID 83401

RE: Facility ID No. 777-00299, HighStone Inc., Idaho Falls
Permit to Construct (PTC) Revision - Transfer of Ownership

Dear Mr. Hulet:

This letter acknowledges receipt on July 5, 2011, of a request for the transfer of ownership for a permit to construct (PTC), in accordance with IDAPA 58.01.01.209.04 (Rules for the Control of Air Pollution in Idaho). The transfer of ownership request is for PTC No. P-2011.0100, issued on May 24, 2011, and is based on the following information:

Current Permittee Information

Permittee: ASM
Mailing Address: 4362 N. Yellowstone Hwy., Idaho Falls, ID 83401
Responsible Official: Alan Smith
Phone Number: (208) 821-1302
Person to Contact: Alan Smith
Phone Number: (208) 821-1302

Proposed Permittee Information

Permittee: HighStone Inc.
Mailing Address: 4362 N. Yellowstone Hwy., Idaho Falls, ID 83401
Responsible Official: John Hulet
Phone Number: (208) 690-1273
Person to Contact: John Hulet
Phone Number: (208) 690-1273

DEQ is only revising the cover page of the permit to construct (PTC). All other information in the permits remains the same.

HighStone Inc., Idaho Falls
July 22, 2011
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Attached to this letter is revised PTCs No. P-2011.0100 with the revised cover page reflecting the transfer of ownership. The effective date of the PTC transfer is July 22, 2011. DEQ recommends that you maintain a copy of this letter for your records.

This transfer does not release HighStone Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. If you have any questions, please contact Darrin Pampaian at 208.373.0502 or permit.writer@deq.idaho.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

Permit No. P-2011.0100 PROJ 60895

MS/dp

<p style="text-align: center;">Air Quality PERMIT TO CONSTRUCT State of Idaho</p> <p>Department of Environmental Quality</p>	PERMIT NUMBER	CLASS	SIC
	P-2011.0100	SM	2951
	FACILITY ID	AQCR	NAICS
	777-00299	Portable	324121
	ZONE	UTM COORDINATES (km)	
Portable	Portable	Portable	
PERMITTEE			
HighStone Inc.			
PROJECT			
PROJECT No. 60895 Facility name change			
MAILING ADDRESS	CITY	STATE	ZIP
4362 N. Yellowstone Hwy.	Idaho Falls	ID	83401
FACILITY CONTACT	TITLE	TELEPHONE	
John Hulet	Asphalt foreman	(208) 690-1273	
RESPONSIBLE OFFICIAL	TITLE	TELEPHONE	
John Hulet	Asphalt foreman	(208) 690-1273	
EXACT PLANT LOCATION		COUNTY	
Portable		Portable	
GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS			
Hot Mix Asphalt Plant			
PERMIT AUTHORITY			
<p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.</p> <p>This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.</p>			
		DATE ISSUED	July 22, 2011
DARRIN PAMPAIAN, P.E., PERMIT WRITER			
			
MIKE SIMON, STATIONARY SOURCE MANAGER			

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MMBtu	million British thermal units
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. STATEWIDE REQUIREMENTS

The permittee shall comply with the following conditions when the hot-mix asphalt (HMA) facility is operated anywhere (nonattainment, attainment, or unclassifiable areas) within the state of Idaho.

1.1 Emission Limits

1.1.1 Asphalt Dryer Emission Limits

Particulate matter (PM) emissions from the HMA dryer stack shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), nor shall particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) emissions from the HMA dryer stack exceed the emission rate limit listed in the appendix of this permit.

1.1.2 Other Particulate Matter Emission Limits

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from a stack, vent, or other functionally equivalent opening, shall not contain PM emissions in excess of 0.04 gr/dscf.

1.1.3 Opacity Limit

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 IDAPA 58.01.01.625. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

1.1.4 Visible Emission Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

1.2 Operating Requirements

1.2.1 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 that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

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

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

1.2.2 Dryer Burner Fuel Limits

The burner fuel shall be distillate fuel oil, propane or natural gas only.

1.2.3 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment. A scrubbing media flow rate monitor is required only if a wet scrubber is used to control some or all of the emissions from the HMA plant.

1.2.4 Operations and Maintenance Manual Requirements

The permittee shall have an Operations and Maintenance (O&M) Manual for the portable hot mix asphalt plant which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The O&M Manual shall:

- Be based on specifications and operating conditions which will be used to demonstrate compliance with the visible emissions standards appearing under IDAPA 58.01.01.625.
- Address the operation, maintenance, and repair of each source to ensure good working order and operation as efficiently as practicable.
- Include startup, shutdown, and maintenance procedures; upset conditions and corrective action procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections during planned maintenance outages.

In the event DEQ requires additional information and/or revisions to the O&M manual, ASM shall submit the requested information and/or revisions to DEQ within 30 days of receiving a written request from DEQ.

ASM shall comply with the DEQ approved O&M manual which shall be enforceable through this Permit.

The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

[May 24, 2011]

1.2.5 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within the manufacturer and O&M Manual specifications. Documentation of both the manufacturer and O&M Manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

1.3 Monitoring And Recordkeeping Requirements

1.3.1 Operating Parameters

The following parameters shall be monitored and recorded. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request:

- Pressure drop across the air pollution control device once on a daily basis.
- HMA production in tons per day (T/day) and tons per month (T/mo).

1.3.2 Reasonable Control Measures

The permittee shall monitor and record in a log, during operation, the periodic method(s) used to reasonably control fugitive dust emissions from this facility. The log shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

1.3.3 Monitor Generator Hours of Operation

The permittee shall monitor and record the generator's hours of operation on a monthly basis if generator hours of operation are limited in Permit Condition No. 1, 2, or 3. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

1.3.4 PM and PM₁₀ Performance Testing Requirements

If a PM test has not been conducted in accordance with 40 CFR 60.93 within the past five years, then within 180 days issuance of this permit, a performance test shall be conducted on the HMA facility under worst-case normal operating conditions in accordance with 40 CFR 60.93, IDAPA 58.01.01.157, and General Provision 6 of this permit. The performance test shall be conducted to demonstrate compliance with the 0.04 grains of PM per dry standard cubic foot (gr/dscf) emissions limit, the pound per hour PM₁₀ emissions limit of Permit Condition 1.1.1, and the 20% opacity emissions limits of Permit Conditions 1.1.3 and 1.1.4. The following shall be monitored and recorded during the performance tests:

- A description of how the test represents worst-case normal operating condition for the HMA facility;
- The hourly production rate of the hot-mix asphalt plant expressed as tons per hour;
- The pressure drop across the air pollution control device and the scrubbing media flow rate of that device. If the HMA facility utilizes a baghouse instead of a wet scrubber, then only record the pressure drop across the baghouse; and
- The visible emissions observed during the performance tests from the HMA facility stack and visible emissions observed at the property boundary.

1.3.5 Performance Testing Frequency and Records

The permittee shall conduct performance tests at a frequency of no less than once every five years in accordance with Permit Condition 1.3.4.

The permittee shall maintain a copy of the performance test results of the most recently conducted stack test on this asphalt facility. This report shall be made available to DEQ representatives upon request.

1.4. Reporting Requirements

1.4.1 Performance Test Protocol

Prior to conducting any emission test, the permittee is strongly encouraged to submit in writing to DEQ, at least 30 days in advance, a performance test protocol in accordance with IDAPA 58.01.01.157.01.a.

1.4.2 Performance Test Report

In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of completion of the test.

1.4.3 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 and a scaled plot plan to:

PERF Processing Unit
Idaho Department - Air Quality
1410 N. Hilton
Boise, ID 83706-1255

1.4.4 Certification of Documents

All documents, including, but not limited to, application forms for permits to construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ 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(s) are true, accurate, and complete.

2. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is operated in any attainment or unclassifiable areas, and when it is not collocated, within the state of Idaho.

2.1 Operating Requirements

2.1.1 Facility Throughput Limits

The production rate of the HMA facility shall not exceed a maximum of 876,000 tons per any consecutive 12-month period when located in any attainment or unclassifiable area.

2.1.2 Collocation Requirements

When the HMA facility is to be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant; the permittee must comply with the collocation requirements of Permit Condition No. 3.

2.1.3 Generator Hours of Operation

The generator shall not be operated more than 8,760 hours per any consecutive 12-month period when located in any attainment or unclassifiable area.

3. **ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED**

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is to be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant within the state of Idaho. The HMA facility may only collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable HMA plant that has been permitted to specifically allow collocation.

3.1 **Operating Requirements**

3.1.1 **Collocation Areas**

The HMA facility may collocate in attainment or unclassifiable areas only. The permittee shall not collocate in a nonattainment area, or proposed nonattainment area, without obtaining a permit that specifically allows for collocation in a nonattainment area.

3.1.2 **Number of Portable Sources**

The HMA facility may only collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable HMA plant that has been permitted to specifically allow collocation.

3.1.3 **Facility Throughput Limits**

The production rate of the HMA facility shall not exceed a maximum of 438,000 tons per any consecutive 12-month period when collocated with another HMA plant, concrete batch plant, or rock-crushing plant.

3.1.4 **Generator Hours of Operation**

The generator shall not be operated more than 4,380 hours per consecutive 12-month period when collocated with another HMA plant, concrete batch plant, or rock-crushing plant.

4. NONATTAINMENT AREA REQUIREMENTS

The permittee shall comply with the Statewide Requirements in Permit Section 1 and the following permit conditions when the HMA facility is operated in any PM₁₀ nonattainment areas within the state of Idaho. While operating the HMA facility under the conditions set forth in Permit Condition 4, the HMA facility may not collocate with any other facility.

4.1 Operating Requirements

4.1.1 Facility Throughput Limits

The production rate of the HMA facility shall not exceed a maximum of 158,146 tons per any consecutive 12-month period when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.2 Collocation Requirements

The HMA facility shall not be collocated with another portable HMA plant, rock-crushing plant, or concrete batch plant when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.3 Generator Hours of Operation

The generator shall not be operated more than 1,581 hours per any consecutive 12-month period when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

4.1.4 Sandpoint Nonattainment Area

The HMA facility shall not operate in the Sandpoint PM₁₀ nonattainment area.

5. APPENDIX

PORTABLE HOT-MIX ASPHALT FACILITY

HOURLY PM₁₀ EMISSION LIMITS

Source Description	PM ₁₀ (lb/hr) ^a
Dryer stack outlet	3.47

^a As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emission estimation methods used in the permit application analysis.

6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 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 performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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

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

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.