



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 13, 2001

CERTIFIED MAIL # 7099 3220 0006 2681 6517

Norm Rudolph, Safety Director
Idaho Sand and Gravel Company
P.O. Box 1310
Nampa, ID 83687

RE: Project No. 010027, Idaho Sand and Gravel Company, Portable HMA
(Fuel Change, PTC No. 777-00283)

Dear Mr. Rudolph:

The Idaho Department of Environmental Quality (the Department) is issuing modified permit to construct (PTC) Number 777-00283 for Idaho Sand and Gravel Company's Portable Hot-Mix Asphalt Plant in accordance with IDAPA 58.01.01.200 through 223 (*Rules for the Control of Air Pollution in Idaho*). This PTC is effective immediately and is based on the permit application received on August 6, 2001.

This permit does not release the permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

You are strongly encouraged to attend a meeting with the Department to discuss the permit terms and requirements with which your facility must comply. Matthew Stoll of the Boise Regional Office will contact you regarding this meeting. The Department strongly recommends that in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may 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, the Department encourages you to contact Marjorie MartzEmerson at (208) 373-0502 to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Dan Salgado at (208) 373-0502.

Sincerely,

R Wilton for:

Katherine B. Kelly
Administrator
Air Quality Division

KK/tk AIR.SSBG.PORT.4005.460

G:\AHW\COE\PTCS\IDAHO SAND & GRAVEL\FINAL\IP-010027 PERMIT LETTER.DOC

Enclosures

cc: Belinda McFarland, Technical Services
Matt Stoll, Boise Regional Office
Laurie Kral, EPA Region 10



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 777-00283

AQCR: CLASS: SM

SIC: 2951 ZONE:

UTM COORDINATE (km):

1. **PERMITTEE**
Idaho Sand and Gravel Company

2. **PROJECT**
Portable Hot-Mix Asphalt Plant

3. MAILING ADDRESS PO Box 1310	CITY Nampa	STATE Idaho	ZIP 83653
--	----------------------	-----------------------	---------------------

4. FACILITY CONTACT Norm Rudolph	TITLE Safety Director	TELEPHONE (208) 466-5001
--	---------------------------------	------------------------------------

5. RESPONSIBLE OFFICIAL Norm Rudolph	TITLE Safety Director	TELEPHONE (208) 466-5001
--	---------------------------------	------------------------------------

6. EXACT PLANT LOCATION Portable	COUNTY Varies
--	-------------------------

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Hot-Mix Asphalt Production (Including Aggregate, Asphalt, and Concrete Production when Collocated)

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 the Idaho Department of Environmental Quality (Department) or its officers, agents, or employees, assumes 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.

K. Wilkoy (acting)

DATE ISSUED: November 13, 2001

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

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

1. STATEWIDE REQUIREMENTS

The permittee shall comply with the following sourcewide conditions when the hot-mix asphalt 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 hot-mix asphalt 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 ten micrometers (PM₁₀), or carbon monoxide (CO) emissions exceed any corresponding 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 grains per dry standard cubic foot (gr/dscf).

1.1.3 Opacity Limit

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed 20 percent opacity for a period or periods aggregating more than three minutes in any 60 minute period as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

1.1.4 Fugitive Emissions 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 Department-approved alternative method.

1.2 OPERATING REQUIREMENTS

1.2.1 Reasonable Control of Fugitive Emissions

Where practicable, as is required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of PM-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:

1.2.1.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, or the clearing of lands;

1.2.1.2 Applying asphalt, oil, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces which can create dust;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel

Location: Portable

Date Issued: November 13, 2001

1.2.1.3 Installing and using 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;

1.2.1.4 Covering open-bodied trucks transporting materials likely to give rise to airborne dusts;

1.2.1.5 Paving roadways and maintaining them in a clean condition; or

1.2.1.6 Promptly removing earth or other stored material from streets.

1.2.2 Dryer Burner Fuel Limits

The burner fuel shall only be either distilled #2 fuel oil, natural gas, propane, or used oil only.

1.2.3 Monitoring Equipment

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

1.2.4 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an operations and maintenance (O&M) manual for the air pollution control device describing procedures followed to comply with General Provision B and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be available to Department representatives upon request.

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's and 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 Department representatives upon request.

1.2.6 Used Oil Specifications

The concentrations/parameters of contaminants in any used oil fuel shall not exceed the following levels, as defined in 40 CFR 279.11:

1.2.6.1	Arsenic	5 ppm by weight
1.2.6.2	Cadmium	2 ppm by weight
1.2.6.3	Chromium	10 ppm by weight
1.2.6.4	Lead	100 ppm by weight
1.2.6.5	Total halogens	1,000 ppm by weight

1.2.7 Used Oil Sulfur Content

The sulfur content of the used oil shall not exceed 0.66% by weight.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

1.2.8 Generator

This permit does not allow the use of a generator with this source.

1.3 MONITORING AND RECORDKEEPING REQUIREMENTS

1.3.1 Monitor Facility Throughput

A compilation of the most recent two years' data shall be kept onsite, in a log, and be made available to Department representatives upon request. The following parameters shall be monitored and recorded:

1.3.1.1 Pressure drop across the air pollution control device once on a daily basis.

1.3.1.2 When a scrubber is utilized, the scrubbing media flow rate to the air pollution control device once on a daily basis.

1.3.1.3 Hot-mix asphalt production in tons per day (T/day) and tons per consecutive 12-month period.

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 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' data shall be kept onsite and made available to Department representatives upon request.

1.3.3 40 CFR 670.93 Initial Performance Testing Requirements

The permittee shall conduct a performance test on the hot-mix asphalt facility in accordance 40 CFR 60.93, IDAPA 58.01.01.157, and General Provision F of this permit. The performance test shall be conducted to demonstrate compliance with the applicable PM standards defined in 40 CFR 60.92. The performance test shall be conducted with used oil as the sole fuel source during the test.

1.3.4 Opacity and Visible Emissions Testing

The permittee shall conduct a visual determination of opacity from the hot-mix asphalt facility stack and a visual determination of emissions at the property boundary when burning used oil, in accordance with IDAPA 58.01.01.157 and General Provision F of this permit.

1.3.5 Used Oil Monitoring and Recordkeeping

1.3.5.1 On-Specification Used Oil Fuel

In accordance with 40 CFR 279.72, on-specification used oil fuel, the permittee shall perform the following:

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

- **Analysis of Used Oil Fuel**

The permittee may determine that used oil that is to be burned for energy recovery meets the fuel specifications of 40 CFR 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications.

- **Record Retention**

To demonstrate meeting the specifications for used oil fuel under 40 CFR 279.11, the permittee must keep copies of analyses for the used oil (or other information used to make the determination) for three years.

1.3.5.2 Tracking of On-Specification Used Oil Delivery

The permittee shall assure compliance with 40 CFR 279.74(b), which states that a generator, transporter, processor/refiner, or burner who first claims used oil to be burned for energy recovery meets the fuel specifications under 40 CFR 279.11 must keep a record of each shipment of used oil to an on-specification used oil burner. Records for each shipment must include the following information:

- The name and address of the facility receiving the shipment;
- The quantity of used oil fuel delivered;
- The date of shipment or delivery; and
- A cross-reference to the record of used oil analyses or other information used to make the determination the oil meets the specification as required under 40 CFR 279.72(a).
- *Record retention.* The records described in this section 1.3.5.2 must be maintained for at least three years, in accordance with 40 CFR 279.74(b).

1.3.6 Used Oil Sulfur Content Verification

The permittee must verify the sulfur content of the used oil by performing the analyses or by obtaining copies of analyses or other information documenting that, for each shipment of used oil received, the used oil fuel meets the sulfur content specified in Section 1.2.6. The permittee must keep copies of the analyses of the used oil (or other information used to make the determination) for three years and provide the analyses to Department 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 the Department, 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

The permittee shall submit a written report of the performance test results to the Department within 30 days of test completion in accordance with IDAPA 58.01.01.157.04.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

1.4.3 Relocation

- 1.4.3.1 All existing portable equipment shall be registered. At least 10 days prior to relocating any equipment covered by this permit, the permittee shall submit a complete Portable Equipment Registration and Relocation Form (available from the Department website at: <http://www2.state.id.us/deq/air/air1.htm>) in accordance with IDAPA 58.01.01.500, as well as a scaled plot plan to:

PERF Processing Unit
Idaho DEQ - Air Quality
1410 North 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 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(s) are true, accurate, and complete.

2. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED

The permittee shall comply with the conditions in Section 1 of this permit and the following permit conditions when the hot-mix asphalt 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 hot-mix asphalt facility shall not exceed a maximum of 6,492 T/day and 1,029,998 T/yr when located in any attainment or unclassifiable area, when burning used oil. The production rate of the hot-mix asphalt facility shall not exceed a maximum of 4,848 T/day and 1,029,998 T/yr when located in any non-attainment or unclassifiable area, when burning used oil.

2.1.2 Collocation Requirements

When the hot-mix asphalt facility is to be collocated with another portable hot-mix asphalt plant, rock crushing plant, or concrete batch plant; compliance with the collocation requirements of Section 3 of this permit must be met.

3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED

- 3.1 The permittee shall comply with the conditions in Section 1 of this permit and the following permit conditions when the hot-mix asphalt facility is to be collocated with another portable hot-mix asphalt plant, rock crushing plant, or concrete batch plant within the state of Idaho. The hot-mix asphalt facility may only collocate with either one portable rock crushing plant, one portable concrete batch plant, or one other portable hot-mix asphalt plant, which has been permitted to specifically allow collocation. This hot-mix asphalt plant may also collocate with any rock crusher that is operating in accordance with all of the applicable provisions of a permit by rule (IDAPA 58.01.01.201)

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

3.2 Facility Throughput Limits

The production rate of the hot-mix asphalt facility shall not exceed a maximum of 514,999 T/yr when collocated with another hot-mix asphalt plant, concrete batch plant, or rock crushing plant.

3.3 Sulfur Content of Used Oil

The sulfur content of the used oil in any of the plants at a collocation site shall not exceed 0.66% by weight. Used oil content shall be verified in accordance with Section 1.3.6.

4. NONATTAINMENT AREA REQUIREMENTS

The permittee shall comply with the conditions in Section 1 of this permit and the following permit conditions when the hot-mix asphalt facility is operated in any PM_{10} non-attainment areas within the state of Idaho.

4.1 OPERATING REQUIREMENTS

4.1.1 Facility Throughput Limits

The production rate of the hot-mix asphalt facility shall not exceed a maximum of 4,848 T/day. In addition, the production rate of the hot-mix asphalt facility shall not exceed a maximum of 1,029,998 T/yr when located in any PM_{10} non-attainment area or proposed PM_{10} non-attainment area.

4.1.2 Collocation Requirements

This hot-mix asphalt plant may also collocate with any rock crusher that is operating in accordance with all of the applicable provisions of a permit by rule (IDAPA 58.01.01.790).

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00283

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

APPENDIX

Portable Hot-Mix Asphalt Facility

Emission Limits

Source Description	PM₁₀^b	CO^c
Dryer Stack Outlet	350 lb/day	99 T/yr

- a. As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department's emission estimation methods used in the permit application analysis.
- b. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
- c. Carbon monoxide

Permittee: Idaho Sand and Gravel
Location: Portable

Date Issued: November 13, 2001

PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. 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 emission 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.
- B. 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.
- C. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - 1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 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 emission testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
- D. 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.
- E. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
 - 1. Initiation of Construction - Date
 - 2. Completion/Cessation of Construction - Date
 - 3. Actual Production Startup - Date
 - 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission 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 the Department approval. 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 emission limit(s) set forth in this permit.
- G. 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.