



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

October 16, 2015

Karl Kloepfer, Secretary  
Kloepfer Inc. 777-00032  
P.O. Box 840  
Paul, ID 83347

RE: Facility ID No. 777-00032, Kloepfer Inc., Paul  
Final Permit Letter, DEQ Initiated Permit Reissuance

Dear Mr. Kloepfer:

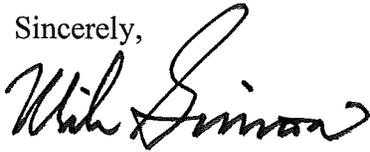
The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2015.0050, Project 61597, to Kloepfer Inc. 777-00032 to list the new throughput limit (in permit condition 2.5) established during performance testing required by the previously issued permit, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is effective immediately and replaces PTC No. P-030421, issued on September 9, 2003. This permit does not release Kloepfer Inc. 777-00032 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis document remains unchanged.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Air Quality and Remediation Manager, at (208) 737-3889 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 Darrin Pampaian at (208) 373-0502 or [darrin.pampaian@deq.idaho.gov](mailto:darrin.pampaian@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". The signature is written in a cursive style with a large, looping initial "M".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/drp

Enclosure

Permit No. P-2015.0050 Project 61597

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Kloopfer Inc. 777-00032  
**Permit Number** P-2015.0050  
**Project ID** 61597  
**Facility ID** 777-00032  
**Facility Location** Portable throughout Idaho

### 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 the 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; and (g) in no manner implies or suggests that the Idaho 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** October 16, 2015



*Darrin Pampaian*

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**Darrin Pampaian, P.E., Permit Writer**



*Mike Simon*

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**Mike Simon, Stationary Source Manager**

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# 1 Permit Scope

## Purpose

- 1.1 The permit was modified on October 16, 2015 to incorporate the results of the July 2015 source test. [8/16/2015]
- 1.2 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.
- 1.3 This PTC replaces Permit to Construct No. P-030421, issued on September 9, 2003. [8/16/2015]

## Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	CMI portable hot-mix asphalt plant	Baghouse
	IC engine powering an electrical generator	None

## 2 Emissions Limits

### 2.1 Hot-Mix Asphalt Dryer Stack Emissions Limits

- Particulate matter emissions from the hot-mix asphalt dryer stack shall not exceed 0.04 gr/dscf.
- Sulfur dioxide emissions from the hot-mix asphalt dryer stack shall not exceed any corresponding emissions rate limit listed in Appendix A, Table 3.1.
- While operating in any PM<sub>10</sub> non-attainment area or proposed PM<sub>10</sub> non-attainment area, PM<sub>10</sub> emissions from the hot-mix asphalt dryer stack shall not exceed any corresponding emission rate limit listed in Appendix A, Table 3.2.

### 2.2 Other Particulate Matter Emission Limits

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

### 2.3 Opacity Limit

Visible emissions shall not exceed 20% opacity as required in IDAPA 58.01.01.625.

### 2.4 Visible Emissions Limits at Property Boundary

Visible emissions emanating from all asphalt plant operations 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 60, Appendix A, or a Department approved alternative.

## Operating Requirements

### 2.5 Production Rate Limit

The production rate of the hot-mix asphalt plant shall not exceed a maximum of 5,500 tons per day (T/day).

[8/16/2015]

### 2.6 Air Stagnation Advisory Days

No operation of the hot-mix asphalt plant shall occur during days of Air Stagnation Advisory.

### 2.7 Burner Fuel

The sulfur content of the burner fuel shall not exceed any of the following as required by IDAPA 58.01.01.727 and IDAPA 58.01.01.728:

- ASTM Grade 1 fuel oil - 0.3 percent by weight
- ASTM Grade 2 fuel oil - 0.5 percent by weight
- ASTM Grade 4, 5, or 6 fuel oil - 1.75 percent by weight

### 2.8 Electrical Generator Set

Operation of the electrical generator set shall not exceed a maximum of 1,620 hours per any consecutive 12-month period (hr/yr).

## **2.9 Monitoring Equipment**

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

## **2.10 Pressure Drop Across Air Pollution Control Device**

The pressure drop shall be maintained within manufacturer's or O&M manual specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain on-site at all times and shall be made available to Department representatives upon request.

## **2.11 Reasonable Control of Fugitive Emissions**

Emissions due to operations of the hot-mix asphalt plant, traffic on haul roads, traffic areas, and all aggregate handling equipment shall be reasonably controlled in accordance with IDAPA 58.01.01.651 and IDAPA 58.01.01.808.

Reasonable precautions may include, but are not limited to, the following:

- Use of water or environmentally safe chemicals;
- Application of dust suppressants;
- Use of control equipment;
- Covering of trucks;
- Paving; and
- Prompt removal of earth or other stored material from streets, where practical.

## **Monitoring and Recordkeeping Requirements**

### **2.12 Operations and Maintenance Manual Requirements**

The permittee shall have developed an O&M manual for the baghouse which describes the procedures that will be followed to comply with General Compliance general provision and the Monitoring Equipment permit condition. This manual shall be kept on-site at all times and shall be made available to Department representatives upon request.

### **2.13 Monitoring Parameters**

The permittee shall monitor and record the following information. Records of this information shall be kept onsite for the most recent 2-year period and shall be made available to Department representatives upon request.

- Hot-mix asphalt production in tons per month and tons per year;
- While located in any PM<sub>10</sub> non-attainment area or proposed PM<sub>10</sub> non-attainment area, the hot-mix asphalt production in tons per day;
- The ASTM grade of the fuel oil used in the burner;
- The pressure drop across the baghouse on a daily basis; and
- The electrical generator set operation in hours per month and hours per year.

## **2.14 Reasonable Control Measures**

The permittee shall monitor and maintain records, during operation, of the periodic method(s) used to reasonable control emissions from the following: dryers; systems for screening, handling, storing, and weighing hot aggregate; systems for mixing hot-mix asphalt; and the loading, transfer, and storage systems associated with emissions control systems. The records shall also 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. The records shall be kept onsite for the most recent 2-year period and shall be made available to Department representatives upon request.

## **Reporting and Recordkeeping Requirements**

### **2.15 Reporting Requirements for Portable Equipment**

At least 10 days prior to relocation of any equipment covered by this permit the permittee shall report to the Department on relocation forms supplied by the Department, the following information:

- Exact location of the new site of operations;
- Start-up date at the new site of operations and the duration of operations at the new site;
- A scaled plot plan clearly showing the property boundary of the new site; and
- Equipment to be used at the new site or location.

### **2.16 Certification of Documents**

All documents, including, but not limited to, application forms for PTC's monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications submitted to the Department shall contain a certification by the 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.

### 3 Appendix A

#### 3.1 SO<sub>2</sub> Emissions Rate Limits

Table 3.1 Hourly and Annual SO<sub>2</sub> Emissions Rate Limits<sup>a</sup>

Source Description	SO <sub>2</sub>	
	lb/hr	T/yr
Dryer stack	117.9	99.0

<sup>a</sup> 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.

#### 3.2 PM<sub>10</sub> Emissions Rate Limits While Operating in a PM<sub>10</sub> Non-Attainment Area or Proposed PM<sub>10</sub> Non-Attainment Area

Table 3.2 Hourly PM<sub>10</sub> Emissions Rate Limits<sup>a</sup>

Source Description	PM <sub>10</sub>
	lb/hr
Dryer stack	9.5

<sup>a</sup> 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.

## 4 General Provisions

### General Compliance

4.1 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, 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.]

4.2 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.

[IDAPA 58.01.01.211, 5/1/94]

4.3 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

4.4 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, 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 Notification

4.5 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]

4.6 The permittee shall furnish DEQ written notifications as follows:

- 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

- 4.7 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.
- 4.8 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.
- 4.9 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 and 4/11/15]

## Monitoring and Recordkeeping

- 4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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**

- 4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

- 4.12 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**

- 4.13 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**

- 4.14 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**

- 4.15 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**

- 4.16 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]