



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

October 5, 2012

Brad Griffith, Vice President
POE Asphalt Paving, Inc.
2732 North Beck Road
Post Falls, ID 83854

RE: Facility ID No. 777-00057, POE Asphalt Paving, Inc., Post Falls
Final Permit Letter

Dear Mr. Griffith:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0041 Project 61114 to POE Asphalt Paving, Inc., located at Post Falls for incorporating new throughput limits based on testing done September 21, 2011. 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 information provided in the letter from DEQ to John Cushman of POE Asphalt Paving, Inc. dated September 5, 2012.

This permit is effective immediately and replaces PTC No. 2011.0041, issued on March 23, 2011. This permit does not release POE Asphalt Paving, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Carole Zundel at (208) 373-0477 or carole.zundel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\CZ

Permit No. P-2011.0041 PROJ 61114

Enclosures

Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality	PERMIT NUMBER	CLASS	SIC
	P-2011.0041	SM	2951
	FACILITY ID	AQCR	NAICS
	777-00057	62	324121
	ZONE	UTM COORDINATES (km)	
	11	498.3	5286.5

PERMITTEE

POE Asphalt Paving, Inc.

PROJECT

PROJECT No. 61114 PTC Modification

MAILING ADDRESS	CITY	STATE	ZIP
2732 North Beck Road	Post Falls	ID	83854

FACILITY CONTACT	TITLE	TELEPHONE
John Cushman	Equipment Manager	(208) 777-0498

RESPONSIBLE	TITLE	TELEPHONE
Brad Griffith	Vice President	(208) 777-0498

EXACT PLANT LOCATION	COUNTY
2732 North Beck Road, Post Falls	Kootenai

GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Production of asphaltic concrete

PERMIT AUTHORITY

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.

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.

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 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.

	DATE ISSUED	October 5, 2012
CAROLE ZUNDEL, PERMIT WRITER		
		
MIKE SIMON, STATIONARY SOURCE MANAGER		

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PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a modification of a permit to construct a hot mix asphalt plant. [March 23, 2011]
2. Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin. [March 23, 2011]
3. This PTC replaces Permit to Construct No. P-2011.0021, issued on March 23, 2011. [October 5, 2012]
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
<u>Hot mix asphalt plant</u> Manufacturer: Astec Model: RDB-9640 Type: Drum mix Max. hourly production: 500 tons per hour Burner fuel type: Natural gas Burner heat input: 103.5 MMBtu/hr Max RAP usage: 60%	<u>Baghouse</u> Manufacturer: CMI Model: APM 1080
<u>Asphalt tank heater</u> Make/Model: Powerflame C1-0 Fuel type: No. 2 non-road low sulfur fuel oil Rating: 0.6 MMBtu/hr	None

[March 23, 2011]

Process Description

5. Process Description

Raw aggregate is removed from storage piles by front-end loaders and is loaded into bins. Aggregate is discharged from the bins to a conveyor belt which feeds a natural-gas-fired drying drum. A mixture of aggregate and oil exit the drum as hot asphalt. Asphalt is loaded into trucks and transported off-site.

Power for the process will be provided by line power.

[March 23, 2011]

FACILITY-WIDE CONDITIONS

Fuel Specifications

6. Allowable Fuels – HMA Drum Mixer

The HMA drum mixer shall use only natural gas.

[March 23, 2011]

7. Allowable fuels – Asphalt Tank Heater

The asphalt tank heater shall use only non-road distillate fuel oil as defined by 40 CFR 80.10(b) & (c).

[March 23, 2011]

8. Distillate Fuel Oil Specifications – Asphalt Tank Heater

Distillate fuel oil combusted in the asphalt tank heater shall meet the following standards:

- ASTM Grades 1 or 2, or a mixture of ASTM Grades 1 and 2, and
- Maximum sulfur content of 0.5% (5000 ppm) by weight.

[March 23, 2011]

Fuels Monitoring and Recordkeeping Requirements

9. Distillate Fuel Oil Documentation

On an as-received basis for each shipment, the permittee shall maintain the following supplier verified and certified information:

- For all distillate fuel oil used at this facility:
 - ASTM grade and
 - % sulfur content by weight.

[March 23, 2011]

Opacity

10. Emissions Limits

In accordance with IDAPA 58.01.01.625, emissions from the HMA drum mixer baghouse stack, vents and functionally equivalent openings associated with the HMA drum mixer or asphalt tank heater shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

11. Monitoring and Recordkeeping

To ensure compliance with Opacity Emissions Limits, each week that the HMA plant is operating, the permittee shall conduct a site-wide inspection of potential point sources of visible emissions; including the HMA drum mixer baghouse stack, asphalt tank heater, and any stack, vent, or other functionally equivalent opening. This inspection shall take place during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point source of emissions, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform an EPA Method 9 opacity test using an observer certified in accordance with EPA Method 9 and holding an up-to-date, valid certification.

The permittee shall maintain records of the results of each see/no see visible emissions inspection and each Method 9 opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[March 23, 2011]

Fugitive Dust Control

12. Reasonable Control of Fugitive Emissions

In accordance with IDAPA 58.01.01.650-651 and IDAPA 58.01.01.808, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration 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 particulate matter (PM). Some of the reasonable precautions include, but are not limited to, the following:

- Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as aggregate stockpiling, scalping screen changing and general maintenance.
- 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, oil, 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.

[March 23, 2011]

13. Fugitive Emissions Control

Fugitive emissions shall be controlled in the following areas of the HMA plant by:

- Using, when practical, water sprays at all transfer points downstream of aggregate and RAP bins.
- Operating a covered conveyor(s) from HMA drum mixer to the silo fill transfer point, or if loaded directly into truck, from the drum mixer to the truck loadout transfer point.

[March 23, 2011]

14. Fugitive Dust Monitoring

In accordance with IDAPA 58.01.01.211.01 and IDAPA 58.01.01.799,

- Each day the facility is operated, the permittee shall conduct a site-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions using see/no see observations.
- The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions

were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[March 23, 2011]

Odors

15. Odors

In accordance with IDAPA 58.01.01.776.01, the permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

[March 23, 2011]

16. Odor Complaints

The permittee shall maintain records of all odor complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[March 23, 2011]

Open Burning

17. The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-616.

[March 23, 2011]

Monitoring and Recordkeeping

18. All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with Permit to Construct General Provision 45.

[March 23, 2011]

Performance Testing

19. For any performance test required in this permit, the permittee shall use the test methods listed in the table below.

Table 3: TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM grain loading	EPA Method 5	The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).
Opacity	EPA Method 9 and IDAPA 58.01.01.625	The observer shall be certified in accordance with EPA Method 9 and holding an up-to-date, valid certification.

* Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

[March 23, 2011]

20. Any testing required by this permit shall conform to:

- 40 CFR 60, Subpart A – General Provisions, and

- 40 CFR 60 Subpart I – Standards of Performance for Hot Mix Asphalt Facilities, and
- Permit to Construct General Provisions 57 through 59.

[March 23, 2011]

40 CFR 60, Subpart A - General Provisions

21. The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A – General Provisions. The following summary table is intended to direct the permittee toward the proper section of Subpart A.

Table 4: SUBPART A – GENERAL PROVISIONS

Section	Section Title	Summary of Section Requirements
60.4	Address	<ul style="list-style-type: none"> • <u>All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart I and IIII shall be submitted to:</u> Air Quality Permit Compliance Department of Environmental Quality Coeur d’Alene Regional Office 2110 IronWood Parkway Coeur d’Alene, ID 83814 <u>All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart A shall be submitted to:</u> Director Air and Waste Air Quality Permit Compliance EPA Region X Department of Environmental Quality 1200 Sixth Avenue Coeur d’Alene Regional Office OAQ-107 2110 Ironwood Parkway Seattle, WA 98101 Coeur d’Alene, ID 83814
60.7(a),(b),(c), (d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> • Notification of commencement of construction postmarked no later than 30 days after such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a monitoring device is inoperative. • Maintain in a permanent form records suitable for inspection of all Monitoring and Recordkeeping permit condition requirements, performance testing measurements, operation and maintenance manual, adjustments/maintenance performed and other required information. Records shall be maintained for a period of five years, with the exception of the O&M manual, which shall be updated as needed for the life of the equipment. Records are to be made available to DEQ representatives upon request.
60.8	Performance Tests	<ul style="list-style-type: none"> • The owner or operator shall provide notice at least 30 days prior to any performance test to afford an opportunity for an observer to be present during testing. • Within 60 days of achieving maximum production, but not later than 180 days after startup the permittee shall conduct performance test(s) and furnish a written report of the results of the test(s).
60.11(a), (d),(f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> • Other than opacity standards, when performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any credible evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> • Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. • The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. • Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in

Section	Section Title	Summary of Section Requirements
		40 CFR 60.11(e).
60.12	Circumvention	<ul style="list-style-type: none"> No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.
60.14	Modification	<ul style="list-style-type: none"> A physical or operational change which results in an increase in the hourly emission rate to which a standard applies shall be considered a modification unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards. No owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted in accordance with IDAPA 58.01.01.220-223.
60.15	Reconstruction	<ul style="list-style-type: none"> An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[March 23, 2011]

Regulatory Citation and Incorporation by Reference

22. Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:
- Standards of Performance of New Stationary Sources (NSPS), 40 CFR 60, including :
 - Subpart I – Standards of Performance for Hot Mix Asphalt Plants
 - National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology [MACT] Standards), 40 CFR 63.

[March 23, 2011]

23. For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[March 23, 2011]

HOT MIX ASPHALT PLANT

24. Emission Controls Description

Table 2 HOT MIX ASPHALT PLANT DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Asphalt plant	Baghouse
Asphalt tank heater	None

[March 23, 2011]

Emission Limits

25. Particulate Matter

In accordance with 40 CFR 60 Subpart I, the exhaust of the HMA drum mixer baghouse stack shall not:

- Contain particulate matter in excess of 0.04 gr/dscf
- Exhibit 20 percent opacity, or greater

[March 23, 2011]

26. PM₁₀ Emissions Limit

The PM₁₀ emissions from the baghouse stack shall not exceed 11.5 lb/hr.

[March 23, 2011]

Operating Requirements

27. Allowable Raw Materials

- The HMA facility shall process only aggregate, asphalt cement, and recycled asphalt cement (RAP) as raw materials.
- RAP used as part of the aggregate shall not exceed 60 percent by weight of the mix for any mix of HMA produced.

[March 23, 2011]

28. Baghouse System Control Equipment

The permittee shall operate and maintain a baghouse on the HMA drum mixer. The collected particulate from the baghouse shall be routed to the HMA drum mixer for incorporation into the final HMA product.

[March 23, 2011]

29. Production Limits

The maximum allowable HMA production rates are:

- 412 tons per hour.
- 4,994 tons per day.
- 250,000 tons per year.

[October 5, 2012]

Monitoring and Recordkeeping Requirements

30. Production Limit - RAP

- On each mix of HMA that uses RAP, monitor and record the tons of RAP used in the mix.

- On each mix of HMA that uses RAP, monitor and record the tons of HMA produced.
- On each mix of HMA that uses RAP:
 - Calculate the % RAP: $\% \text{ RAP} = (\text{RAP, expressed as tons in that mix}) / (\text{HMA produced, expressed as tons in that mix}) * 100$
 - Monitor and record the % RAP per mix.

[March 23, 2011]

31. Production Limit – HMA

- Each day that the HMA drum mixer is operated, each hour, monitor and record the HMA produced in tons per hour to demonstrate compliance with the HMA production limits.
- Each day that the HMA is operated, the hourly HMA production shall be summed to calculate the tons per day.
- Each calendar month that the HMA drum mixer is operated:
 - The hourly HMA production shall be summed to calculate the tons per month
 - The tons per month shall be summed over the previous consecutive 12 month period to calculate the tons per year.

[March 23, 2011]

Performance Testing Requirements – HMA Baghouse – Compliance Demonstrations

32. Particulate Matter (PM), PM₁₀, and Opacity Emission Limit Test

For the initial test, if a performance test for PM, PM₁₀, and opacity has not been performed in the last five years, a performance test shall be performed on the HMA drum mixer baghouse stack within 180 operating days after the issuance of this permit to demonstrate compliance with the PM, PM₁₀, and opacity emission limits specified in this permit.

[March 23, 2011]

33. Periodic PM, PM₁₀, and Opacity Emission Limit Tests

Periodic performance tests shall be performed on the HMA drum mixer baghouse stack no less than once every five years following the date of the previous performance test.

[March 23, 2011]

34. Initial and Periodic Performance Test Monitoring and Recordkeeping

All performance test monitoring and recordkeeping shall comply with Permit to Construct General Provision 45.

Specifically, the permittee shall monitor and record the following during each performance HMA Baghouse test:

- The HMA production rate, in tons per hour
- The RAP usage in tons per hour

[March 23, 2011]

Reporting Requirements – Compliance Demonstrations

35. Initial and Periodic Performance Test Reporting

All performance test reports shall:

- Comply with Permit to Construct General Provisions, and
- Contain a certification by a responsible official, and

- Be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

[March 23, 2011]

36. Baghouse Operations & Maintenance (O&M) Manual

Within 60 days of permit issuance, the permittee shall have developed an Operations and Maintenance (O&M) manual for the HMA drum mixer baghouse which describes the procedures that will be followed to comply with Permit to Construct General Provision 38 of this permit. The manual shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

At a minimum the following items shall be included in the Baghouse O&M manual;

- Procedures for inspecting and maintaining the HMA drum mixer baghouse.
- Schedule and procedures for corrective action that will be taken if visible emissions are present from the HMA drum mixer baghouse at any time, including procedures to determine whether bags are ruptured, and procedures to determine if bags or cartridges are not appropriately secured in place.

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions. The O&M manual shall remain on site and be made available to DEQ representatives upon request.

[March 23, 2011]

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

37. 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.]

38. 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]

39. 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

40. 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 Notification

41. 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, 5/1/94]

Performance Testing

42. 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.
43. 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.
44. 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.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

45. 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

46. 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

47. 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

48. 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

49. 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

50. 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

51. 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]

APPENDIX A – SEPTEMBER 5, 2012 LETTER



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814 • (208) 769-1422

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

September 5, 2012

By: **Certified Mail No. 7011 0110 0000 4529 5738**

Mr. John Cushman
Equipment Manager
POE Asphalt Paving, Inc.
2732 North Beck Road
Post Falls, ID 83854

Permit # P-2011.0041
Project # 6114
Facility ID # 777-00057
Regional Office CRO
Logged:

Re: POE Asphalt Paving, Inc., Facility ID No. 777-00057;
Particulate Matter Performance Test Review

Dear Mr. Cushman:

On December 23, 2011, the Department of Environmental Quality (DEQ) received a performance test report, prepared by Spidell and Associates, for the hot mix asphalt plant operated by POE Asphalt Paving in Post Falls, Idaho. The performance test was conducted on September 21, 2011. The purpose of the test was to demonstrate compliance with the requirements of Permit to Construct No. P-2011.0041, issued March 23, 2011, and 40 CFR 60 Subpart I – Standards of Performance for Hot Mix Asphalt Facilities. DEQ did not have an observer present during the test.

Based on a review of the submitted test report, DEQ has determined that the particulate matter and opacity testing on the Astec RDB-9640 hot mix asphalt plant demonstrated compliance with the emission limits listed in P-2011.0041 and 40 CFR 60 Subpart I during the test period. A summary of the test results is provided in Table 1.

Table 1. Astec RDB-9640 Asphalt Plant Test Results

Pollutant	Measured Emissions	Emissions Limit	Measured Emissions as % of Limit
PM	0.004 gr/dscf ^(a)	0.04 gr/dscf	10%
PM ₁₀	6.6 lb/hr ^(b)	11.5 lb/hr	57%

- a) Compliance with the NSPS grainloading standard is determined using the results of Method 5 (filterable particulate).
- b) Compliance with the PM₁₀ lb/hr emission rate is determined by summing the results of Method 5 (filterable) and Method 202 (condensable) emissions.

The average production rate of asphalt during emission testing was 344 tons per hour, which included 30% recycled asphalt product. The rated capacity of the dryer is 500 tons per hour. The dryer was operated at ~69% of rated capacity during the test. **DEQ is imposing a new asphalt production limit of 412 tons per hour (120% of the average test production rate) in accordance with IDAPA 58.0.01.157.02.b. This new operational limit is effective immediately.** DEQ will revise the permit to include this operational limit within 30 days of this letter, unless POE Asphalt Paving contacts DEQ to discuss alternatives. Should POE Asphalt Paving accept the permit limit as stated in this letter, no permit fees are required by DEQ to revise the permit. For questions regarding the permitting process, please contact Bill Rogers, Permit Program Coordinator, at 208-373-0437.

The asphalt dryer was fueled with natural gas. The particulate matter emissions are controlled by a baghouse. The average pressured drop across the baghouse was 5.3 inches of water column. The highest 3-minute average opacity observed during the test was 0%.

According to Permit Condition 33, periodic performance tests shall be conducted no less than once every five years. Therefore, the next test shall be conducted no later than September 21, 2016. Please call me at (208) 769-1422, or Zach Klotovich at (208) 373-0295, if you have any questions regarding this performance test review.

Sincerely,



Almer Casile
Air Quality Analyst

AC:vh

c: Zach Klotovich, Technical Services Division
Bill Rogers, Air Quality Division

hourly limit = 412 T/hr
daily " = 4994 T/day