LRAPA
Lane Regional Air Protection Agency

LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056

STANDARD AIR CONTAMINANT DISCHARGE PERMIT (STANDARD ACDP)

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:
Wildish Building Materials Co.
3600 Wildish Lane
Eugene, Oregon 97408

Plant Location:
Wildish Sand & Gravel
3600 Wildish Lane
Eugene, Oregon 97408

Permit Number: 208871
Permit Type: Standard
SIC: 2951 Stationary Asphalt Concrete
Issuance Date: June 24, 2020
Expiration Date: June 24, 2025
Modification Date: December 22, 2020

Information Relied Upon:
Application Number: 66561
Dated: 11/13/20

Land Use Compatibility Statement:
From: Lane County
Date: September 21, 1999

Fee Basis:
Title 7, Table 1, Part B.7 –
Asphaltic concrete paving plant, both stationary and portable
Part C.3 –
Source electing to maintain the netting basis
Part C.4 –
Source that requests a PSEL equal to or greater than the SER for a regulated pollutant

Permitted Sources:
Stationary Asphalt Concrete
Batch Mix and Drum Mix Plant with Cyclone and Venturi Wet Scrubber

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

December 22, 2020
Dated

ADDENDUM NO. 1
Non-PSD/NSR Basic Technical Permit Modification

In accordance with 37-0066(4)(b)(A) of LRAPA's Rules and Regulations, the following changes have been made to the Standard Air Contaminant Discharge Permit No. 208871:

- Modifying Condition 45 to extend the grain loading standard and removal efficiency source testing date until December 31, 2021.

Source Testing Requirement

45. The permittee must demonstrate compliance with the grain loading standards in Condition 9 and a removal efficiency of at least 80% of the potential PM emissions as specified in Condition 13 by conducting a source test which must be performed within by December 31, 2021 and thereafter, within five (5) years of the previous source test. [LRAPA 34-015]

BAE/cmw
12/22/2020

Abbreviations, Acronyms, and Definitions

ACDP	Air Contaminant Discharge Permit
Calendar Year	The 12-month period beginning January 1st and ending December 31st
CFR	Code of Federal Regulation
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
DEQ	Oregon Department of Environmental Quality
dscf	Dry Standard Cubic Foot
EF	Emission Factor
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
GDF	Gasoline Dispensing Facility
GHG	Greenhouse gases
gr/dscf	Grains per Dry Standard Cubic Foot
HMA	Hot Mix Asphalt
I&M	Inspection and Maintenance
lb	pounds
LRAPA	Lane Regional Air Protection Agency
MMBtu	Million British thermal units
NA	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	Oxygen
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particle Matter
PM_{10}	Particulate Matter less than 10 microns in size
$PM_{2.5}$	Particulate Matter less than 2.5 microns in size
ppm	Part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RAP	Recycled Asphalt Pavement
RAS	Recycled Asphalt Shingles
scf	Standard Cubic Foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VE	Visible Emissions
VOC	Volatile Organic Compound
Year	A period consisting of any 12-consecutive calendar months

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]

G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]

G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Performance Standards and Emission Limits

G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]

G5. No person shall discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]

G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]

G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]

G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]

G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(1)]

G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

G11. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions

resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Record-keeping

G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]

a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.

b. Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. – 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.

G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]

G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. The upset log shall include the following: [LRAPA 36-025(3) and 36-030(1)]

a. date and time each event was reported to LRAPA;

b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;

d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and

e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for five (5) calendar years. [LRAPA 36-02(3)]

Excess Emissions: Scheduled Maintenance

G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA

authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]

a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;

b. identification of the specific production or emission control device or system to be maintained;

c. identification of the nature of the air contaminants likely to be omitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and

d. identification of specific procedures to be followed which will minimize excess emissions at all times during the scheduled maintenance.

G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to cause excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as $PM_{2.5}$ or PM_{10} nonattainment areas. [LRAPA 36-015(6)]

G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015(3), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015-7]

Air Pollution Emergencies

G19. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittee responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

Notification of Construction/Modification

G20. The permittee must notify LRAPA in writing using an LRAPA “Notice of Intent to Construct” form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:

a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions

b. making any physical change or changes in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or

c. constructing or modifying any pollution control equipment.

Notification of Name Change

G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

G22. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDPs. [LRAPA 37-0040(2)(b)]

G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit; [LRAPA 37-0082(1)(a)]

a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or

b. Another type of permit, ACDP, or Title V, has been issued authorizing operation of the source.

G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]

G25. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

Termination Conditions

G26. This permit shall be automatically terminated upon: [LRAPA 37-0082(2)]

a. Issuance of a renewal or new ACDP for the same activity or operation;

b. Written request of the permittee, if LRAPA determines that a permit is no longer required;

c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;

d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.

G27. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any

applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]

G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three (3) months of the permit expiration date. [LRAPA 37-0082(3)]

G29. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided in LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A written request for a hearing must be received by LRAPA within 90 days of service of the notice on the permittee and the request must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]

G30. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

G31. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/12/2018]

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Issued To:
Wildish Building Materials Co.
3600 Wildish Lane
Eugene, Oregon 97408

Mailing Address:
Wildish Sand & Gravel
P.O. Box 40310
Eugene, Oregon 97404

Permit Number: 208871
Permit Type: Standard
SIC: 2951 Stationary Asphalt Concrete
Issuance Date: June 24, 2020
Expiration Date: June 24, 2025

Information Relied Upon:
Application Number: 63400 & 65802
Dated: 12/01/17 & 01/17/20

Land Use Compatibility Statement:
From: Lane County
Date: September 21, 1999

Fee Basis:
Table 1, Part B.7:
Asphaltic concrete paving plant, both stationary and portable
Table 1, Part C.3
Source electing to maintain the netting basis
Table 1, Part C.4
Source that requests a PSEL equal to or greater than the SER for a regulated pollutant

Permitted Sources:
Stationary Asphalt Concrete
Batch Mix and Drum Mix Plant with Cyclone and Venturi Wet Scrubber

Issued By: _____
Merlyn L. Hough, Director

Effective Date: June 24, 2020

Table of Contents

Permitted Activities 3
Emission Unit Description 3
Plant Site Emission Limits (PSELs) 3
PSEL Monitoring and Compliance 3
General Emission Limitations 4
Emission Limits for Hot Mix Asphalt Plant [LRAPA 33-075] 5
Fugitive Emissions Limits 5
Gasoline Dispensing Facility (GDF) Emission Limits (EU: IEU) 6
Operation and Maintenance Requirements: Venturi Scrubber 8
Burner Tune-up Conditions [LRAPA 32-007 & 32-008] 9
Source Testing Requirement 10
Monitoring and Recordkeeping Requirements 11
Reporting Requirements 12
Fee Schedule 13
Abbreviations, Acronyms, and Definitions 14

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge air contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit Description

2. The emission units regulated by this permit are the following:

EU ID	Emission Unit (EU) Description	Pollution Controls
HMA Plant	Stationary natural gas-fired Asphaltic Concrete Paving Plant – 550 tons/hour maximum rate	Cyclone and Venturi Scrubber
IEU	Insignificant Emission Unit – Gasoline Dispensing Facility (GDF)	Submerged filling and work practices

Plant Site Emission Limits (PSELs)

3. The total emissions from all sources at the facility must not exceed the annual (12-month rolling) PSELs below [LRAPA 42-0041]

Annual PSELs
(tons per year)

Pollutants	PM	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	GHG
Totals	38	17	11	39	99	39	39	74,000

4. Any changes in operations that may increase the emissions above the PSELs must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA. [LRAPA 34-034]

PSEL Monitoring and Compliance

5. ***By the 15th working day of each month***, the permittee must determine compliance with PSELs in Condition 3 for the previous 12 consecutive calendar month period for each pollutant, except GHG, in accordance with the following procedures. [LRAPA 42-0080(4)(c)]

$$E = \sum_{i=1}^{12} \frac{EF \cdot P_i}{K}$$

Where:
- E = Emissions in tons per year;
- $\sum$ = Symbol representing “summation of”;
- i = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months;
- EF = Pollutant emission factor (see Condition 6)
- P = Monthly process production (tons of asphalt produced)

K = Conversion Factor Constant: 2,000 pounds per 1 ton

6. The permittee must use the following emission factors to estimate process emissions: [LRAPA 42-0080(4)(c)]

Pollutant	Emissions Factor (lb/ton)
PM	0.05
PM_{10}	0.034
$PM_{2.5}$	0.021
CO	0.10
NO_X	0.026
SO_2	0.0046
VOC	0.032

General Emission Limitations

7. For sources, other than wood-fired boilers and fugitive sources, the permittee must not allow to be emitted any visible emission that equal or exceed any average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(1) and (3)]

8. For the visible emission standard in Condition 7, the permittee, at a minimum, must have an observation period of six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 203B (Modified EPA Method 9) reading represents 15 seconds of time. Three-minute aggregate periods are measured by: [LRAPA 32-010(2)(a)-(c)]

   8.a. EPA Method 203B;

   8.b. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or

   8.c. An alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B.

9. The permittee must ensure that particulate matter emissions from any air contaminant source installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, other than fuel burning equipment and fugitive emissions, do not exceed 0.14 grains per dry standard cubic foot (dscf). [LRAPA 32-015(2)(b)(B)]

10. The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from the Hot Mix Asphalt (HMA) Plant in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. Process weight is the total weight of all materials introduced into a piece of process equipment. Solid fuels charged are considered part of the process weight, but liquid and gaseous fuels and combustion air are not. [LRAPA 32-045(1) and (2)]

11. The permittee must operate and maintain at all times, all plant process equipment and all air pollution control equipment in a manner which minimizes air contaminant discharges in accordance with LRAPA's highest and best requirements. [LRAPA 32-005]

12. The permittee may use up to 35% recycled asphalt pavement (RAP) as a component of the asphalt production. If the permittee elects to use more than 35% percentage RAP or to begin using recycled asphalt shingles (RAS) as a component of the asphalt production, the permittee must get written approval by LRAPA prior to the percentage increase of RAP or the use of RAS. [LRAPA 32-007]

Emission Limits for Hot Mix Asphalt Plant [LRAPA 33-075]

13. The permittee must not operate the HMA Plant within any area of Lane County outside special control areas as defined in LRAPA 33-075(1), unless all dusts and gaseous effluents generated by HMA Plant are controlled by a control device or devices with a removal efficiency for particulate matter of at least 80 percent by weight. To determine compliance with this condition, the permittee must conduct a particulate matter source test using DEQ Method 5 at the inlet and outlet of the control device. If it is not feasible to conduct a particulate matter source test at the inlet to the control device, the permittee must provide documentation demonstrating that the control device is designed to meet this condition and prepare and implement an operation and maintenance plan for ensuring that the control device will have at least an 80 percent removal efficiency when operated. [LRAPA 33-075(2)(a)]

14. The permittee must not operate the HMA Plant without installing and operating systems or processes for the control of particulate emissions so as to comply with the emission limits established by the process weight table in LRAPA 33-500. Compliance with the process weight is determined using DEQ Method 5. All source tests much be done using the DEQ *Source Sampling Manual*. [LRAPA 33-075(2)(b)]

15. The permittee, upon request by LRAPA, must develop a fugitive emission control plan. [LRAPA 33-075(2)(d)]

16. The permittee must at all times control so as to maintain the highest possible level of air quality and lowest possible discharge of air contaminants, for all ancillary air contamination sources from the HMA Plant and its facilities which emit air contaminants into the atmosphere such as, but not limited to, the driers openings, screening and classifying system, hot rock elevator, bins, hoppers, and pug mill mixer. [LRAPA 33-075(4)(a)]

17. The permittee must conduct, at all times, the handling of aggregate and truck traffic so as to minimize emissions into the atmosphere. [LRAPA 33-075(4)(b)]

Fugitive Emissions Limits

18. The permittee must take reasonable precautions to prevent fugitive particulate matter from becoming airborne from all site operations from which it may be generated. Such reasonable precautions may include, but not limited to: [LRAPA 48-015(1)(a) through (g)]:

    18.a. Controlling vehicle speeds on unpaved roadways;

    18.b. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;

    18.c. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;

18.d. Covering, at all times when in motion, open-bodied trucks transporting materials likely to become airborne;

18.e. The prompt removal from paved streets of earth or other material which does or may become airborne; and

18.f. Alternative precautions approved by LRAPA.

19. For purposes of Condition 18 through 21, fugitive emissions are visible emissions that leave the property of a source for a period or periods totaling more than 18 seconds in a six (6) minute period. The minimum observation time must be at least six (6) minutes unless otherwise specified in this permit. [LRAPA 48-015(2)(a)]

20. The permittee must determine fugitive emission by using EPA Method 22 at the downwind property boundary. [LRAPA 48-015(2)(b)]

21. If requested by LRAPA, the permittee must develop a fugitive emission control plan, including but not limited to the work practices in Condition 18, that will prevent any visible emission from leaving the property of a source for more than 18 seconds in a six (6) minute period following the procedures of EPA Method 22. [LRAPA 48-015(3)]

Gasoline Dispensing Facility (GDF) Emission Limits (EU: IEU)

22. The permittee of the affected source to which the emission standards apply is each GDF. The affected source includes each gasoline cargo tank during the unloading of gasoline to a GDF and also includes each storage tank. [LRAPA 44-190(1)] This condition is enforceable only by LRAPA.

23. The permittee of a GDF that has any gasoline storage tanks with a capacity of 250 gallons or more must comply with the work practices requirements and the submerged fill requirements in Condition 31. [LRAPA 44-190(3)] This condition is enforceable only by LRAPA.

24. The permittee of a GDF whose total volume of gasoline that is loaded into all gasoline storage tanks greater than 250 gallon capacity must comply with the vapor balance requirements in LRAPA 44-240 if either: [LRAPA 44-190(4)] This condition is enforceable only by LRAPA.

24.a. the annual throughput is 480,000 gallons or more in any 12 consecutive months; or

24.b. the monthly throughput is 100,000 gallons or more, as calculated on a rolling 30 day basis.

25. The permittee must, upon request by LRAPA, demonstrate that their annual and average monthly gasoline throughput is below any applicable thresholds. [LRAPA 44-190(5)] This condition is enforceable only by LRAPA.

26. Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two (2) or more GDF at separate locations within the area source, each GDF is treated as a separate affected source. [LRAPA 44-190(8)] This condition is enforceable only by LRAPA.

27. If the permittee's throughput ever exceeds an applicable throughput threshold, the permittee will remain subject to the requirements for the GDF above the threshold, even if the permittee's throughput later falls below the applicable throughput thresholds. [LRAPA 44-190(9)] This condition is enforceable only by LRAPA.

28. The dispensing of gasoline from a fixed gasoline storage tanks at GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle

or other gasoline-fueled engine or equipment used with the area source is only subject to Condition 31. [LRAPA 44-190(10)] This condition is enforceable only by LRAPA.

29. For any affected source subject to the provisions of LRAPA 44-170 through 44-290 and another federal rule, the permittee may elect to comply only with the more stringent provisions of the applicable rules. The permittee of an affected source must consider all provisions of the rule, including monitoring, recordkeeping, and reporting. The permittee of an affected source must identify the affected source and provisions with which the permittee of an affected source will comply in the Notification of Compliance Status required under LRAPA 44-260. The permittee of an affected source also must demonstrate in the Notification of Compliance Status that each provision of which the permittee of an affected source will comply is at least as stringent as the otherwise applicable requirements in LRAPA 44-170 through 44-290. The permittee of an affected source is responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that your determination was in error, and, as a result, the permittee of an affected source is violating LRAPA 44-170 through 44-290. Compliance with this rule is the permittee's responsibility and the Notification of Compliance Status does not alter or affect that responsibility. [LRAPA 44-190(11)] This condition is enforceable only by LRAPA.

30. Each permittee of an affected source must comply with Conditions 30.a and 30.b: [LRAPA 44-225(1) and (2)] This condition is enforceable only by LRAPA.

    30.a. The permittee of an affected source must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA and the EPA Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

    30.b. The permittee of an affected source must keep applicable records and submit reports as specified in Conditions 39.

31. The permittee of a GDF must take reasonable precautions to prevent gasoline vapor releases to the atmosphere. Reasonable precautions include but are not limited to the following: [LRAPA 44-230(1)(a) through (g) and (7)] This condition is enforceable only by LRAPA.

    31.a. Minimize gasoline spills;

    31.b. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full after the nozzle clicks off, such as by checking the vehicle's fuel tank gauge, the person may continue to dispense fuel using best judgment and caution to prevent a spill;

    31.c. Post a sign at the GDF instructing a person filling up a motor vehicle to not top off vehicle tanks;

    31.d. Clean up spills as expeditiously as practicable;

    31.e. Cover all gasoline storage tank fill-pipes with a gasketed seal and all gasoline containers when not in use. Portable gasoline containers that meet the requirements of 40 C.F.R. part 59 subpart F are considered acceptable for compliance with this condition; and

    31.f. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

    31.g. Ensure that cargo tanks unloading at the GDF comply with Conditions 31.a, 31.d, and 31.e.

32. Any cargo tank unloading at a GDF equipped with a functional vapor balance system must connect to the vapor balance system whenever gasoline is being loaded. [LRAPA 44-230(2)] This condition is enforceable only by LRAPA.

33. The permittee of a cargo tank or GDF must only load gasoline into storage tanks at the facility by utilizing submerged filling as specified in Conditions 33.a, 33.b, or 33.c. The applicable distances in Conditions 33.a and 33.b must be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. [LRAPA 44-230(3)(a) through (c)] This condition is enforceable only by LRAPA.

    33.a. Submerged fill pipes installed on or before November 9, 2006, must extend to no less than 12 inches from the bottom of the storage tank.

    33.b. Submerged fill pipes installed after November 9, 2006, must extend to no less than 6 inches from the bottom of the storage tank.

    33.c. Submerged fill pipes not meeting the specifications of Conditions 33.a or 33.b are allowed if the permittee of a GDF can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Demonstration providing such demonstration must be made available for inspection by LRAPA and the EPA Administrator during the course of the site visit.

34. The permittee must submit the applicable notifications as required in LRAPA 44-260. [LRAPA 44-230(4)] This condition is enforceable only by LRAPA.

35. The permittee must have records available within 24 hours of a request by LRAPA or the EPA Administrator to document gasoline throughput. [LRAPA 44-230(5)] This condition is enforceable only by LRAPA.

36. The permittee must comply with the requirements of Conditions 31 through 35 by the applicable dates specified in LRAPA 44-220. [LRAPA 44-230(6)] This condition is enforceable only by LRAPA.

37. The permittee must keep records of the total monthly and annual throughput in gallons as defined. [LRAPA 44-270(1)(c)] This condition is enforceable only by LRAPA.

38. The permittee must retain records from Condition 37 for a period of five (5) years and must be available within 24 hours of a request by LRAPA and the EPA Administrator. [LRAPA 44-270(2)] This condition is enforceable only by LRAPA.

39. The permittee must keep the following records: [LRAPA 44-270(4)(a) and (b)] This condition is enforceable only by LRAPA.

    39.a. Records of the occurrence and duration of each malfunction of operation, i.e., process equipment, or the air pollution control and monitoring equipment.

    39.b. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 30.b, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

<u>Operation and Maintenance Requirements: Venturi Scrubber</u>

40. The permittee must operate and maintain the Venturi Scrubber at the highest reasonable efficiency and effectiveness to minimize emissions. The permittee must operate and have the Venturi Scrubber functioning properly at all times when the HMA Plant is in operation. [LRAPA 32-007]

41. The permittee must operate/maintain the Venturi Scrubber's water pressure of flow rate (as measured) within the operational range of the manufacturer's design specifications (or current engineering evaluation): [LRAPA 32-007(2)]

    41.a. The permittee must install, operate and maintain a pressure gauge or flow meter on the scrubber to display the scrubber's water pressure or flow rate.

    41.b. The permittee must post the intended water pressure or flow rate design specification range on the scrubber at a location near the respective measuring device.

    41.c. The permittee must investigate and commence corrective action measures within 24 hours of documenting system operation outside of the intended water pressure or flow rate range.

    41.d. The permittee must investigate and act to correct water pressures or flow rates that fall outside the intended water pressure or flow rate range. If the permittee fails to investigate and act to correct the deviation within 24 hours it is considered a violation of Condition 41.

Burner Tune-up Conditions [LRAPA 32-007]

42. The permittee must tune the burner of the HMA Plant using the procedures described in Conditions 43 and 44 at least once in any year when the total asphalt production equals or exceeds 50,000 tons for the previous calendar year. During any year for which burner tuning is required by this condition, the tuning must be completed, and a report submitted to LRAPA by July 15th. [LRAPA 32-007(1)]

43. The permittee must ensure that the burner tuning is performed by a qualified person after the plant is sufficiently warmed up and while the plant is operating within 10% of the normal maximum operating capacity. Normal maximum operating capacity is the plant's maximum operating capacity or the maximum rate which the permittee expects to achieve within the term of the Air Contaminant Discharge Permit. [LRAPA 32-007(1)]

44. The permittee must maintain records that demonstrate that the burner is properly tuned. At a minimum, the following information must be recorded prior to tuning and after tuning, and reported to LRAPA for each tune-up; [LRAPA 32-007(1)(b)]

    44.a. Exhaust gas flow rate (dscfm);

    44.b. Carbon monoxide concentration (ppm) – specify whether on a wet or dry basis;

    44.c. Oxygen concentration (%) – specify whether on a wet or dry basis;

    44.d. Stack exhaust gas temperature;

    44.e. Asphalt production rate in tons/hr;

    44.f. Asphalt mix temperature;

    44.g. % asphalt oil in mix;

    44.h. RAP content as a percent of mix production; and

    44.i. Fuel usage in units of therms or cubic feet per ton of asphalt produced.

45. The permittee is not required to perform a burner tune-up during a year in which a valid source test is performed in accordance with source testing requirements in Conditions 46 through 55, and the source test demonstrates that the HMA plant's CO and NO_X emissions are equal to or less than the respective emission factors in Condition 6. The permittee must perform burner turning within 30 calendar days of receiving valid source test results that show an emission rate for either of these pollutants that is higher than the respective emission factor(s) in Condition 6. [LRAPA 32-007(1)(a)]

Source Testing Requirement

46. The permittee must demonstrate compliance with the grain loading standards in Condition 9 and a removal efficiency of at least 80% of the potential PM emissions as specified in Condition 13 by conducting a source test which must be performed within 180 days of the issuance of this permit and thereafter, within five (5) years of the previous source test. [LRAPA 34-015]

47. If, during the permit period, the permittee replaces the HMA Plant's primary pollution control device or the asphalt plant in its entirety, the permittee must perform a source test within 60 days of achieving the maximum production rate at which the asphalt plant will be operated, but not later than 180 days after startup of the modified or new plant. [LRAPA 34-015]

48. The permittee must perform the source test while the plant is operating within 10% of its normal maximum operating capacity. Normal maximum operating capacity is either: [LRAPA 35-0140]

    48.a. The plant's maximum operation rated capacity; or

    48.b. The maximum rate which the permittee expects to achieve within the term of the Air Contaminant Discharge Permit.

49. The permittee must test stack emissions for particulate matter (total) using DEQ Methods 1-5 or EPA Methods 1-5 and Method 202. A source test consists of three (3) replicate test runs conducted under similar plant operating conditions. Minimum sample durations must be 60 minutes per test run and minimum sample gas volumes of 31.8 dry standard cubic feet per test run must be collected. Any deviations must be approved in the LRAPA source test plan review letter prior to the testing. [LRAPA 35-0140]

50. During the source test the permittee must monitor and record the following parameters: [LRAPA 34-015]

    50.a. Stack gas oxygen and carbon dioxide concentration (% on a dry basis);

    50.b. Visible emissions (VE) as measured by Modified EPA Method 9. VE must be monitoring for a period of at least six (6) minutes, during or within 30 minutes of each PM test run (i.e., before or after each run);

    50.c. NO_X emissions (ppm, dry basis) as measured by EPA Method 7E (only during the initial source test after assignment to the permit);

    50.d. CO emissions (ppm, dry basis) as measured by EPA Method 10 (only during the initial source test after assignment to the permit);

    50.e. Asphalt production rate (tons/hour);

    50.f. The asphalt mix temperature;

    50.g. % asphalt oil in mix;

    50.h. RAP (recycled asphalt pavement) content as a percent of mix production, if used;

    50.i. RAS (recycled asphalt shingles) content as a percent of mix production, if used;

    50.j. Fuel usage (e.g., gal, ft^3, therms);

    50.k. Water pressure of flow rate at the inlet to the Venturi Scrubber; and

    50.l. Other parameters as specified in the test plan review letter.

51. The permittee must submit to a source test plan at least 30 days prior to the test date and be approved by LRAPA Source Test Coordinator. All tests must be conducted in accordance with DEQ's *Source Sampling Manual* and the approved source test plan. Test data and results must be submitted for review to the Source Test Coordinator within 60 days of the test date unless otherwise approved in the pretest plan. [LRAPA 35-0120(1)]

52. The permittee must ensure that only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the test. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with the source testing personnel, equipment vendors, or consultants, may render the source test invalid. [LRAPA 35-0120(3)]

53. Unless otherwise specified by permit, state rule, federal regulation, or LRAPA letter, each source test must consist of at least three (3) test runs and the emission results reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee (e.g., forced shutdown, extreme meteorological conditions, failure of an irreplaceable portion of the sample train) a test run is invalidated and cannot be replaced by a valid test run, LRAPA may consider accepting two (2) test runs for demonstrating compliance with the emission limit or DEQ *Source Sampling Manual* standard. However, all test runs, including those deemed invalid, are to be included in the test report. [LRAPA 35-0120(3)]

54. The permittee may request an extension from LRAPA for the testing deadline stated in Condition 46 if the permittee provides adequate justification for the extension: [LRAPA 35-0120(3)]

    54.a. Extension request must be submitted to LRAPA in writing and must include adequate justification for the request and the following information:

        54.a.1. Reason for the extension request;

        54.a.2. Hours of production for each of the previous calendar 12 months; and

        54.a.3. Asphalt production for each of the previous 12 months of plant operation.

    54.b. The decision to grant an extension to a performance test deadline is solely within the discretion of LRAPA. Situations that may warrant an extension include but are not limited to the HMA Plant being out of use for an extended period of time and/or the plant being inoperable due to process or control device breakdowns.

    54.c. LRAPA will notify the permittee in writing of approval or disapproval of the request for an extension as soon as practicable.

    54.d. Unless and until an extension of a performance test deadline is approved by LRAPA, the permittee must comply with the testing deadline requirements of this condition.

55. Any required source test that is declared invalid by LRAPA or fails to demonstrate compliance with the applicable limits in Conditions 46 through 54, must be repeated. The permittee or its agent must submit a new source test plan to LRAPA for approval within 30 calendar days from the date LRAPA declares a source test invalid or the permittee receives source test results that fail to demonstrate compliance with the applicable limits. [LRAPA 35-0140]

<u>Monitoring and Recordkeeping Requirements</u>

56. ***By the 15th of each month***, the permittee must record the information listed in Conditions 57 through 61. A record of the required data must be maintained for a period of five (5) years at the plant site and must be available for inspection by authorized representatives of LRAPA. [LRAPA 34-016(1) and LRAPA 42-0080]

57. The permittee must keep readily accessible records documenting the engineering design specifications for the Venturi Scrubber. The records must be kept for the life of the control device.

58. The permittee must maintain the following weekly records related to the Venturi Scrubber operation:

    58.a. The scrubber's water pressure or flow rate at least once each calendar week the plant is operating; and

    58.b. The date and time corrective action commenced for noted operations outside of the scrubber differential pressure or flow rate operating range.

59. The permittee must retain all records in hard copy or electronic form for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to LRAPA upon request. The permittee must maintain the two (2) most recent years on records on site: [LRAPA 35-160]

Monitoring Parameter	Minimum Recording Frequency
Visible emission (VE) readings	Weekly
Natural gas quantity (MMcf or MMBtu)	Monthly
PSEL monitoring calculations per Condition 4	Monthly
Monitor and record the hours of operation of the HMA Plant that occurs in each calendar month	Monthly
12-calendar month rolling summation of monthly asphalt production (tons)	Monthly
RAP percentage in any hot mix formula	Highest daily percentage
A record of any maintenance to the cyclone and Venturi Scrubber	Each Occurrence
Gasoline throughputs for EU-IEU, in gallons	Monthly
Any changes to the equipment that would affect emissions of the GDF	Each Occurrence

60. The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for three (3) minutes or more in any 60-minute period. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take corrective action or cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by LRAPA in accordance with LRAPA 36-020(4). [LRAPA 36-020]

61. The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each compliant and a record of actions taken for complaint resolution. [LRAPA 34-016]

R**EPORTING** R**EQUIREMENTS**

62. The permittee must report the results of any burner tune-ups performed during a year by July 15th as required by Condition 42. [LRAPA 34-016]

63. ***By February 15th of year*****,** the permittee must submit to LRAPA, of the following information for the preceding calendar year: [LRAPA 34-016]

Parameter	Units	Minimum Recording Frequency
Visible emission readings results	Percent opacity	Weekly
Quantity of natural gas used	MMcf and/or MMBtu	Monthly
Total asphalt produced	Tons	Monthly
Total hours of operation	Hours	Monthly
Calculations of PSELs per Condition 5	Tons	Monthly
Highest RAP percentage	Percentage	Monthly
Total gasoline dispensed	Gallons	Monthly
Maintenance performed on GDF equipment	NA	On occurrence
Records of planned or unplanned excess emissions events	NA	On occurrence
Summary of complaints made, and corrective actions taken	NA	On occurrence
Description of any maintenance performed to the Venturi Scrubber or cyclone	NA	On occurrence

64. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO2e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215.

65. Unless otherwise specified, notifications required by this permit shall be reported to the following office:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
(541) 736-1056

Fee Schedule

66. In accordance with adopted regulations, the permittee will be invoiced each year for the Standard ACDP Annual Fees. [LRAPA Title 37, Table 2]

BAE/CMW
6/24/2020

Abbreviations, Acronyms, and Definitions

ACDP	Air Contaminant Discharge Permit
Calendar Year	The 12-month period beginning January 1st and ending December 31st
CFR	Code of Federal Regulation
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
DEQ	Oregon Department of Environmental Quality
dscf	Dry Standard Cubic Foot
EF	Emission Factor
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
GDF	Gasoline Dispensing Facility
GHG	Greenhouse gases
gr/dscf	Grains per Dry Standard Cubic Foot
HMA	Hot Mix Asphalt
I&M	Inspection and Maintenance
lb	pounds
LRAPA	Lane Regional Air Protection Agency
MMBtu	Million British thermal units
NA	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	Oxygen
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particle Matter
PM_{10}	Particulate Matter less than 10 microns in size
$PM_{2.5}$	Particulate Matter less than 2.5 microns in size
ppm	Part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RAP	Recycled Asphalt Pavement
RAS	Recycled Asphalt Shingles
scf	Standard Cubic Foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
VE	Visible Emissions
VOC	Volatile Organic Compound
Year	A period consisting of any 12-consecutive calendar months

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]

G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]

G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Performance Standards and Emission Limits

G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]

G5. No person shall discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]

G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]

G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]

G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]

G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(1)]

G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

G11. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions

resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Record-keeping

G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]

a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.

b. Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. – 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.

G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]

G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. The upset log shall include the following: [LRAPA 36-025(3) and 36-030(1)]

a. date and time each event was reported to LRAPA;

b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;

d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and

e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for five (5) calendar years. [LRAPA 36-02(3)]

Excess Emissions: Scheduled Maintenance

G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA

authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]

a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;

b. identification of the specific production or emission control device or system to be maintained;

c. identification of the nature of the air contaminants likely to be omitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and

d. identification of specific procedures to be followed which will minimize excess emissions at all times during the scheduled maintenance.

G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to cause excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as $PM_{2.5}$ or PM_{10} nonattainment areas. [LRAPA 36-015(6)]

G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015(3), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015-7]

Air Pollution Emergencies

G19. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittee responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

Notification of Construction/Modification

G20. The permittee must notify LRAPA in writing using an LRAPA “Notice of Intent to Construct” form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:

a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions

b. making any physical change or changes in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or

c. constructing or modifying any pollution control equipment.

Notification of Name Change

G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

G22. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDPs. [LRAPA 37-0040(2)(b)]

G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit; [LRAPA 37-0082(1)(a)]

a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or

b. Another type of permit, ACDP, or Title V, has been issued authorizing operation of the source.

G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]

G25. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

Termination Conditions

G26. This permit shall be automatically terminated upon: [LRAPA 37-0082(2)]

a. Issuance of a renewal or new ACDP for the same activity or operation;

b. Written request of the permittee, if LRAPA determines that a permit is no longer required;

c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;

d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.

G27. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any

applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]

G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three (3) months of the permit expiration date. [LRAPA 37-0082(3)]

G29. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided in LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A written request for a hearing must be received by LRAPA within 90 days of service of the notice on the permittee and the request must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]

G30. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

G31. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/12/2018]

Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit (Standard-ACDP)

REVIEW REPORT

Wildish Building Material Co.
Wildish Sand & Gravel
3600 Wildish Lane
Eugene, Oregon 97408
https://www.wildish.com/

Permit No. 208871

Source Information:

SIC	2951
NAICS	324121

Source Categories	
LRAPA Title 37, Table 1	Part B: 7. Asphaltic concrete paving plants, both stationary and portable Part C: 3. Source electing to maintain the source's netting basis Part C: 4. Source that requests a PSEL equal to or greater than the SER for a regulated pollutant
Public Notice	III

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	N
Emissions credits	N
Compliance schedule	N
Source test	Y

COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual report (due date)	Feb 15
Emission fee report (due date)	N
SACC (due date)	N
Quarterly report (due date)	N

Monthly report (due dates)	N
Excess emissions report	Y
Greenhouse gas report	As applicable
Other report	N

Air Programs

NSPS (list subparts)	N
NESHAP (list subparts)	CCCCCC
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
Part 68 Risk Management	N
Title V	N
ACDP (SIP)	N

Major HAP Source	N
Federal Major Source	N
New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N
Clean Air Mercury Rule (CAMR)	N
TACT	N

Table of Contents

Permitting 3
Source Description 3
Compliance History 4
Special Conditions 4
Emissions 4
Federal Hazardous Air Pollutants (FHAP)/Toxic Air Contaminants 5
Typically Achievable Control Technology (TACT) 8
Greenhouse Gas Reporting Applicability 8
Source Testing 9
Public Notice 9
Attachment A – Detail Sheets 10

Permitting

Permittee Identification

1. Wildish Building Materials Co. – Wildish Sand & Gravel ("Wildish")
   3600 Wildish Lane
   Eugene, Oregon 97408

Permitting Action

2. The proposed permit is a renewal of an existing Standard Air Contaminant Discharge Permit (ACDP) that was issued on June 12, 2013 and was originally scheduled to expire on June 12, 2018. Wildish operates under a Standard ACDP because the facility has requested emission limits that exceed the significant emission rate for particulate matter (PM, PM_{10} and $PM_{2.5}$) and chosen to maintain the netting basis. The existing ACDP remains in effect until final action has been taken on the renewal application because the permittee submitted a timely and complete application for renewal.

Other Permits

3. Wildish has two other air quality permits for this location. They have an LRAPA permit to operate a stationary rock, concrete or asphalt, crushing plant (Crushing Plant) and a stationary concrete manufacturing including redimix and CTB plant (Concrete Plant) at this location.

Attainment Status

4. The hot mix asphalt plant (HMA Plant) is located in an attainment area for PM, $PM_{2.5}$, NO_X, SO_2, and ozone (VOC) and in a maintenance area for PM_{10} and CO.

5. The source is not located within 10 kilometers of any Class I areas.

Source Description

Overview

6. Wildish operates a stationary HMA Plant, a Crushing Plant and a Concrete Plant at this location. The HMA Plant has a maximum production rate of 550 tons per hour. The HMA Plant utilizes a natural gas-fired batch and drum (double barrel) hot mix asphalt plant for production. Both the batch and drum mixing are controlled with a cyclone and Venturi Scrubber. The batch and drum mixing cannot run simultaneously. The HMA plant is allowed to operate 8,760 hours per year up to a maximum rated capacity of 550 tons/hour but with a maximum limitation of 1,000,000 tons of throughput per year. In the last ten (10) years, the facility has demonstrated through records that the HMA Plant has not operated more than 1,050 hours per year and the highest yearly total throughput was just under 300,000 tons. The maximum throughput in the last ten (10) years was 400 tons/hour and the average operating rate is approximately 260 tons/hour.

7. No changes have been made to the facility since the last permit renewal.

Process and Control Devices

8. The existing air contaminant sources at the facility consist of the following:

EU ID	EU Description	Type of Plant	Installation Date	PCD Description	Installation Date
HMA Plant	Stationary natural gas-fired Asphaltic Concrete Paving Plant – 550 tons/hour maximum rate	Batch	1965	Cyclone & Venturi Scrubber	1997
		Drum	1997		
IEU	Insignificant Emission Unit – Gasoline Dispensing Facility (GDF)	NA	2000	NA	NA

Compliance History

9. The facility was last inspected on April 11, 2011 and was found to be in compliance with permit conditions.

10. The facility performed burner tune-ups on: July 21, 2014, May 29, 2015, June 23, 2016, July 5, 2017, June 7, 2018 and July 11, 2019.

11. No enforcement actions have been taken against this source.

12. The facility is required to perform source testing to verify that the HMA Plant meets the required grain loading standard and a cyclone and Venturi Scrubber removal efficiency of at least 80% of the potential PM emissions. The source test must be performed no later than 180 days from the date of issuance of this permit and every five (5) years from previous source test.

Special Conditions

Gasoline Dispensing Facility

13. Wildish must comply with applicable regulations in LRAPA 44-170 through 44-290 and any applicable regulations in 40 CFR 63, Subpart CCCCCC.

Emissions

14. Proposed PSEL information:

Pollutant	Baseline Emissions Rate (tpy)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tpy)	Proposed (tpy)	Previous PSEL (tpy)	Proposed PSEL (tpy)	PSEL Increase (tpy)
PM	14.0	14.0	14.0	38	38	0
PM_{10}	3.4	3.4	3.4	17	17	0
$PM_{2.5}$	NA	2.1	2.1	11	11	0
NO_X	2.5	2.5	2.5	39	39	0
CO	40.0	40.0	40.0	99	99	0
SO_2	0.8	0.8	0.8	39	39	0
VOC	0.5	0.5	0.5	39	39	0

Pollutant	Baseline Emissions Rate (tpy)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tpy)	Proposed (tpy)	Previous PSEL (tpy)	Proposed PSEL (tpy)	PSEL Increase (tpy)
GHG (CO_2e)	4,608	NA	NA	74,000	74,000	0

14.a. The source's baseline emission rates (BERs) for PM, PM_{10}, NO_X, CO, SO_2 and VOC were based on 1978 production rates. The CO BER was revised during the 2013 renewal ACDP to reflect a more accurate emission factor for a source not performing routine burner tuning per LRAPA Title 12. A baseline was not established for $PM_{2.5}$ in accordance with LRAPA 42-0048(3).

14.b. The netting basis for PM, PM_{10}, NO_X, CO, SO_2 and VOC are the same as the BERs. The netting basis for $PM_{2.5}$ was based on a ratio of the PM_{10} PSEL to the $PM_{2.5}$ PSEL (0.52) multiplied by the PM_{10} netting basis.

14.c. PM, PM_{10} and $PM_{2.5}$ PSELs are set per LRAPA 42-0041(2): with the potential to emit greater than or equal to the SER, the source specific PSEL will be set equal to the source's potential to emit, netting basis or a level requested by the applicant, whichever is less.

14.d. GHG BER was based on the 2010 Annual Report information. The GHG BER only needs to include anthropogenic emissions because the source utilizes natural gas therefore, there are no biogenic GHG emissions.

14.e. The "previous" PSELs are PSELs in the 2013 renewal permit.

Federal Hazardous Air Pollutants (FHAPs)/Toxic Air Contaminants (TACs)

15. Under the Cleaner Air Oregon (CAO) program, only existing sources that have been notified by LRAPA are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emission of toxic air contaminants.

LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based concentrations established in rule. All FHAPs are on the list of approximately 600 toxic air contaminants. The FHAPs and toxic air contaminants listed below are based upon source testing and standard emission factors for the types of emission units at this facility. After the source is notified by LRAPA, they must update their inventory and preform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

16. The facility's federal hazardous air pollutants (FHAPs) are below the de minimis levels and therefore, are not included in the PSELs.

17. The following are the facility's actual FHAP and TAC emissions for the 2016 calendar year.

FHAP/TAC	Potential to Emit (pounds/year)
Metals	
Antimony	4.85E-02
Arsenic	1.52E-01

FHAP/TAC	Potential to Emit (pounds/year)
Barium (TAC only)	1.57
Beryllium	4.51E-04
Cadmium	1.12E-01
Chromium VI (TAC only)	1.44E-04
Cobalt	7.00E-03
Copper and compounds (TAC only)	8.43E-01
Lead	1.70E-01
Manganese	2.09
Mercury	6.59E-02
Nickel	16.97
Selenium	9.57E-02
Silver (TAC only)	1.29E-01
Thallium (TAC only)	1.10E-03
Zinc (TAC only)	16.45
Inorganics	
Phosphorus	7.54
Organics	
Acenaphthene** (TAC only)	3.80E-01
Acenaphthylene**	2.32
Acetaldehyde	9.60E-01
Anthracene** (TAC only)	5.99E-02
Benz[a]anthracene** (TAC only)	5.66E-02
Benzene	105.84
Benzo[b]fluoranthene** (TAC only)	2.69E-02
Benzo[j]fluoranthene** (TAC only)	5.40E-05
Benzo[k]fluoranthene** (TAC only)	1.10E-02
Benzo[a]pyrene** (TAC only)	2.64E-03
Benzo[e]pyrene** (TAC only)	2.96E-02
Benzo[g,h,i]perylene** (TAC only)	1.08E-02
Chrysene** (TAC only)	4.85E-02
Crotonaldehyde (TAC only)	8.70E-02
Dibenz[a,h]anthracene** (TAC only)	3.42E-07
Dichlorobenzenes (mixed isomers) (TAC only)	5.72E-05
7,12-Dimethylbenz[a]anthracene** (TAC only)	7.63E-07
Elthyl benzene	71.22
Ethylene (TAC only)	1,884.65
Fluoranthene** (TAC only)	1.65E-01

FHAP/TAC	Potential to Emit (pounds/year)
Fluorene** (TAC only)	1.02
Formaldehyde	836.85
Hexane	247.78
Indeno[1,2,3-cd]pyrene** (TAC only)	1.89E-03
Methyl chloroform	12.92
3-Methylcholanthrene** (TAC only)	8.58E-08
2-Methyl naphthalene** (TAC only)	20.14
Naphthalene**	24.34
Perylene** (TAC only)	2.37E-03
Phenanthrene** (TAC only)	2.05
Pyrene** (TAC only)	1.45E-01
Quinone	8.10E-01
Toluene	43.39
2,2,4-Trimethylpentane	10.77
Xylenes (mixed)	61.95
Total	**3,374.27**

**PAH - polycyclic aromatic hydrocarbon.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

18. The GDF is considered an insignificant emission unit (IEU) because the emissions are below de minimis levels for VOC and HAPs. The GDF was installed prior to the 2008 applicability date for GDFs and is considered an existing source. The above-ground storage tank is 10,000 gallons and makes the facility subject to LRAPA 44-230(1)(a) through 44-230(1)(e) and LRAPA 44-190(5).

19. The facility is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP): Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC but this subpart has not been adopted by LRAPA. Under LRAPA 37-0066(3)(a), Standard ACDPs exclude federal requirements not adopted by the LRAPA Board of Directors.

40 CFR 63 Subpart 6C Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11110	Purpose	Yes	None	--
63.11111	Applicability	Yes	The facility is a GDF and has a monthly throughput of less than 10,000 gallons per month.	--
63.11112	Emission sources covered	Yes	Gasoline storage tanks and associated equipment are applicable	--
63.11113	Compliance dates	Yes	The compliance date for an existing source is no later than January 10, 2008.	--
63.11115	General duties	Yes	None	--

40 CFR 63 Subpart 6C Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11116	Requirements: <10,000 gallons per month	Yes	None	--
63.11117	Requirements: ≥ 10,000 gallons per month	No	None	--
63.11118	Requirements: ≥ 100,000 gallons per month	No	None	--
63.11120	Testing and monitoring	No	None	--
63.11124	Notifications	Yes	None	--
63.11125	Recordkeeping	Yes	Keep records of malfunctions as listed under 40 CFR 63.11125(d)	--
63.11126	Reporting	Yes	Report any malfunctions.	--
63.11130	General provisions	Yes	None	--
63.11131	Implementation and enforcement	Yes	None	--
63.11132	Definitions	Yes	None	--

New Source Performance Standards (NSPSs)

20. The HMA Plant is not subject to 40 CFR 60, Subpart I: Standards of Performance for Hot Mix Asphalt Facilities, because the source has not commenced construction, modification or reconstruction of the HMA Plant after the applicability date of June 11, 1973 per the definitions of "construct, modification, reconstruction, and commence" in 40 CFR 60, Subpart A – General Provisions.

Typically Achievable Control Technology (TACT)

21. LRAPA 32-008 requires an existing unit to meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under Title 30, Title 32, Title 33, Title 38, Title 39, or Title 26 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emission do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare or the environment.

    - The batch and drum mixing exhaust to a cyclone and Venturi Scrubber to control particulate matter and are considered TACT for the HMA plant because the HMA plant is subject to LRAPA 33-075.

Greenhouse Gas Reporting Applicability

22. The source is currently subject to greenhouse gas reporting under OAR 340 division 215 because actual greenhouse gas emissions have been over the 2,500 metric tons (2,756 short tons) of CO_2 equivalents per year.

Source Testing

23. The Astec Drum Mixer (1997) was tested for particulate matter in June 1998. The permitted allowable emissions were 28.6 pounds per hour and 0.2 grains per dry standard cubic foot. The test results demonstrated 19.6 pounds per hour of PM and 0.088 grains per dry standard cubic foot. The source is required to test for PM within ***180 days from the date of issuance this renewal and then every five (5) years of the previous source test***. The source tests are required to determine compliance with the applicable grain loading standards (gr/dscf) and the cyclone and Venturi Scrubber remove at least 80% of the PM emissions.

24. The results of the most recent burner tune-up tests are listed below.

Burner Tune-up Results*

Year	Pollutant	Before Adjustment	After Adjustment
2013	CO	200 ppm (19.41lbs/hr)	25 ppm (2.15 lbs/hr)
2014	CO	326.1 ppm (41.36 lbs/hr)	136.7 ppm (17.51 lbs/hr)
	NO_X	15.3 ppm (3.19 lbs/hr)	19.3 ppm (19.3 lb/hr)
2015	CO	434 ppm (49.7 lbs/hr)	93.6 ppm (10.93 lbs/hr)
	NO_X	39.2 ppm (7.37 lbs/hr)	37.9 ppm (7.27 lbs/hr)
2016	CO	450.9 ppm (36.30 lbs/hr)	104.1 ppm (7.95 lbs/hr)
	NO_X	44.8 ppm (5.93 lbs/hr)	54.8 ppm (6.88 lbs/hr)
2017	CO	794.0 ppm (60.88 lbs/hr)	100.2 ppm (7.18 lbs/hr)
	NO_X	38.7 ppm (4.87 lbs/hr)	48.8 ppm (5.74 lbs/hr)
2018	CO	635.5 ppm (62.10 lbs/hr)	177.9 ppm (17.05 lbs/hr)
	NO_X	30.6 ppm (4.91 lbs/hr)	36.6 ppm (5.76 lbs/hr)
2019	CO	588.0 ppm (81.86 lbs/hr)	172.7 ppm (23.81 lbs/hr)
	NO_X	17.5 ppm (4.0 lbs/hr)	21.8 ppm (4.94 lbs/hr)

*See Calculations in Attachment A at the end of the Review Report

Public Notice

25. The draft permit was on public notice from May 18, 2020 to June 22, 2020. No written comments were submitted during the 35-day comment period.

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BAE/CMW
6/23/2020

Attachment A – Detail Sheets

Hot Mix Asphalt Production per Year								
Pollutant	Maximum Throughput	Maximum Yearly Throughput	Approximate Yearly Throughput	Emission Factors*	Potential Emissions	Current PSELs	Increase from 2013 permit	SER
	ton/hour	tons/year	tons/year		tons/year	tons/year	tons/year	tons/year
PM	550	1,430,000	1,000,000	0.0500	25.00	38	0	25
PM_{10}	550	1,430,000	1,000,000	0.0340	17.00	17	0	15
$PM_{2.5}$	550	1,430,000	1,000,000	0.0210	10.50	11	0	10
CO	550	1,430,000	1,000,000	0.1000	50.00	99	0	100
NO_X	550	1,430,000	1,000,000	0.0260	13.00	39	0	40
SO_2	550	1,430,000	1,000,000	0.0046	2.30	39	0	40
VOC	550	1,430,000	1,000,000	0.0320	22.88	39	0	40

1) Max Hourly Design Rate as reported in the facility's renewal application for the Standard ACDP

2) Operating Schedule of the HMA is 8,760 hours per year

3) The Batch Plant and Drum Mix Plant cannot physically be operated simultaneously

4) The HMA plant utilizes a cyclone and Venturi Scrubber as the control device.

5) All emission factors are from DEQ Emission Factors for Asphalt and Aggregate Industries Revised 08/01/11, **EXCEPT** for PM which is from the June 1998 source test.

6) PM_{10}, CO, and SO_2 emission factors are based for Batch Mix Plant - Natural-Gas Fired with a Venturi Scrubber. $PM_{2.5}$, NO_X, and VOC emission factors are based Drum Mix Plant - Natural-Gas Fired with a Venturi Scrubber. CO emisson factor is based on the facility's required annual burner tune up.

7) Total Annual Emisisons: Max hours per year of 2,600 x Emisson Factor, but the request amount of throughput for a year is 1,000,000 tons.

PM Emission Factor Calculated using 1998 Source Test Data				
1998 Drum Source Test				
	Run 1	**Run 3**	**Run 4**	**Average**
Throughput (tons/hour)	372 (tons/hour)	398 (tons/hour)	370 (tons/hour)	**380 (tons/hour)**
Mass Emissions (lbs/hour)	34.5 (lbs/hour)	15.0 (lbs/hour)	9.4 (lbs/hour)	**19.63 (lbs/hour)**
Emission factor (lbs/ton)				**0.05 (lbs/ton)**

Baseline Emission Rate and Netting Basis					
Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)	
		Previous (tpy)	Proposed (tpy)	Previous PSEL (tpy)	Proposed PSEL (tpy) (3)
PM	14	14	14	38	39
PM_{10}	3.4	3.4	3.4	17	17
$PM_{2.5}$	NA	NA	2.1	11	11
CO (1)	40	40	40	99	99
NO_X	2.5	2.5	2.5	39	39
SO_2	0.8	0.8	0.8	39	39
VOC	0.5	0.5	0.5	39	39
GHG (CO_2e) (2)	4,608	NA	NA	74,000	74,000

1. Per 42-0048(6)(c): The Baseline rate was changed in 2013 because a more accurate emission factor was available and the Netting was changed per 42-0046(3)(e).

2. GHG: utilizied 2010 Annual GHG reporting data

3. 42-0041(2): For sources w/ PTE greater than or equal to the SER, the source specific PSEL will be set equal to the source's PTE, netting basis or a level requested by the applicant, whichever is less, except as provided in subsection (3) or (4)

Burner Tuning CO and NOx (as NO2) Calculations			
Equation: lb/hr = [(ppm/10^6)(lb/mol of pollutant)(dscfm of test)(60 minutes/hr)]/385.32 dscfm/lb*mol			
Molecular Weight of Pollutants			
CO	28		
NO2	46		
Air	385.32	dscfm/lb*mol	
2013			
PPM info			
	Pre-tuning	Post-tuning	
CO ppm	200	25	
Flow	Pre-tuning	Post-tuning	
dscfm	22259	19726	
	Pre-tuning	Post-tuning	
	Results	Results	
CO	19.41	2.15	lb/hr
2014			
PPM info			
	Pre-tuning	Post-tuning	
CO ppm	326.1	136.7	
NO2 ppm	15.3	19.3	
Flow	Pre-tuning	Post-tuning	
dscfm	29091	29385	
	Pre-tuning	Post-tuning	
	Results	Results	
CO	41.36	17.51	lb/hr
NO2	3.19	4.06	lb/hr
2015			
PPM info			
	Pre-tuning	Post-tuning	
CO ppm	434.00	93.60	
NO2 ppm	39.20	37.90	
Flow	Pre-tuning	Post-tuning	
dscfm	26265	26782	
	Pre-tuning	Post-tuning	
	Results	Results	
CO	49.70	10.93	lb/hr
NO2	7.37	7.27	lb/hr
2016			
PPM info			
	Pre-tuning	Post-tuning	
CO ppm	450.90	104.10	
NO2 ppm	44.80	54.80	
Flow	Pre-tuning	Post-tuning	
dscfm	18466	17521	
	Pre-tuning	Post-tuning	
	Results	Results	
CO	36.30	7.95	lb/hr
NO2	5.93	6.88	lb/hr