Statement of Basis

Permit to Construct No. P-2011.0099
Project ID 61457

Lakeside Industries dba Valley Paving 00281
Portable, Idaho

Facility ID 777-00281

Final

April 1, 2015
Darrin Pampaian, P.E.
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.
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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC acceptable ambient concentrations
AACC acceptable ambient concentrations for carcinogens
acfm actual cubic feet per minute
ASTM American Society for Testing and Materials
BACT Best Available Control Technology
BMP best management practices
Btu British thermal units
CAA Clean Air Act
CAM Compliance Assurance Monitoring
CAS No. Chemical Abstracts Service registry number
CBP concrete batch plant
CEMS continuous emission monitoring systems
cfm cubic feet per minute
CFR Code of Federal Regulations
CI compression ignition
CMS continuous monitoring systems
CO carbon monoxide
CO\textsubscript{2} carbon dioxide
CO\textsubscript{2e} CO\textsubscript{2} equivalent emissions
COMS continuous opacity monitoring systems
DEQ Department of Environmental Quality
dscf dry standard cubic feet
EL screening emission levels
EPA U.S. Environmental Protection Agency
FEC Facility Emissions Cap
GHG greenhouse gases
gph gallons per hour
gpm gallons per minute
gr grains (1 lb = 7,000 grains)
HAP hazardous air pollutants
HHV higher heating value
HMA hot mix asphalt
hp horsepower
hr/yr hours per consecutive 12 calendar month period
ICE internal combustion engines
IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg inches of water gauge
km kilometers
lb/hr pounds per hour
lb/qtr pound per quarter
m meters
MACT Maximum Achievable Control Technology
mg/dscm milligrams per dry standard cubic meter
MMBtu million British thermal units
MMscf million standard cubic feet
NAAQS National Ambient Air Quality Standard
NESHAP National Emission Standards for Hazardous Air Pollutants
NO\textsubscript{2} nitrogen dioxide
NO\textsubscript{X} nitrogen oxides
NSPS New Source Performance Standards
O&M operation and maintenance
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>O₂</td>
<td>oxygen</td>
</tr>
<tr>
<td>PAH</td>
<td>polyaromatic hydrocarbons</td>
</tr>
<tr>
<td>PC</td>
<td>permit condition</td>
</tr>
<tr>
<td>PCB</td>
<td>polychlorinated biphenyl</td>
</tr>
<tr>
<td>PERF</td>
<td>Portable Equipment Relocation Form</td>
</tr>
<tr>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</td>
</tr>
<tr>
<td>POM</td>
<td>polycyclic organic matter</td>
</tr>
<tr>
<td>ppm</td>
<td>parts per million</td>
</tr>
<tr>
<td>ppmw</td>
<td>parts per million by weight</td>
</tr>
<tr>
<td>PSD</td>
<td>Prevention of Significant Deterioration</td>
</tr>
<tr>
<td>psig</td>
<td>pounds per square inch gauge</td>
</tr>
<tr>
<td>PTC</td>
<td>permit to construct</td>
</tr>
<tr>
<td>PTC/T2</td>
<td>permit to construct and Tier II operating permit</td>
</tr>
<tr>
<td>PTE</td>
<td>potential to emit</td>
</tr>
<tr>
<td>PW</td>
<td>process weight rate</td>
</tr>
<tr>
<td>RAP</td>
<td>recycled asphalt pavement</td>
</tr>
<tr>
<td>RFO</td>
<td>reprocessed fuel oil</td>
</tr>
<tr>
<td>RICE</td>
<td>reciprocating internal combustion engines</td>
</tr>
<tr>
<td>Rules</td>
<td>Rules for the Control of Air Pollution in Idaho</td>
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<tr>
<td>scf</td>
<td>standard cubic feet</td>
</tr>
<tr>
<td>SCL</td>
<td>significant contribution limits</td>
</tr>
<tr>
<td>SIP</td>
<td>State Implementation Plan</td>
</tr>
<tr>
<td>SM</td>
<td>synthetic minor</td>
</tr>
<tr>
<td>SM₈₀</td>
<td>synthetic minor facility with emissions greater than or equal to 80% of a major source threshold</td>
</tr>
<tr>
<td>SO₂</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>SO₅</td>
<td>sulfur oxides</td>
</tr>
<tr>
<td>T/day</td>
<td>tons per calendar day</td>
</tr>
<tr>
<td>T/hr</td>
<td>tons per hour</td>
</tr>
<tr>
<td>T/yr</td>
<td>tons per consecutive 12 calendar month period</td>
</tr>
<tr>
<td>T2</td>
<td>Tier II operating permit</td>
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<tr>
<td>TAP</td>
<td>toxic air pollutants</td>
</tr>
<tr>
<td>TEQ</td>
<td>toxicity equivalent</td>
</tr>
<tr>
<td>T-RACT</td>
<td>Toxic Air Pollutant Reasonably Available Control Technology</td>
</tr>
<tr>
<td>ULSD</td>
<td>ultra-low sulfur diesel</td>
</tr>
<tr>
<td>VOC</td>
<td>volatile organic compounds</td>
</tr>
<tr>
<td>yd³</td>
<td>cubic yards</td>
</tr>
<tr>
<td>μg/m³</td>
<td>micrograms per cubic meter</td>
</tr>
</tbody>
</table>
FACILITY INFORMATION

Description
Lakeside Industries dba Valley Paving 00281 has proposed to revise an existing portable drum-mix asphalt plant. The asphalt plant consists of a parallel-flow asphalt drum mixer equipped with a with a bag house to control particulate matter, and materials transfer equipment. Materials transfer equipment at the facility will include front end loaders, feed bins, storage silos, conveyors, stock piles, and haul trucks.

Asphalt is made at the facility as follows. First, stockpiled aggregate is transferred to feed bins. Aggregate is then dispensed from the feed bins onto feeder conveyors, which transfer the aggregate to the asphalt drum mixer. The Applicant has requested that the asphalt drum mixer be fired on natural gas. Next, aggregate travels through the rotating drum mixer, and when dried and heated, it is mixed with hot liquid asphaltic oil. The resulting asphalt is conveyed to hot storage bins until it can be loaded into trucks for transport off-site or transferred to silos for temporary storage prior to transport off-site. As part of the operation, the Applicant has proposed that a portable rock crusher be allowed to be collocated at the facility.

The Applicant has proposed that only line power will be used at the facility. Therefore, IC engines powering electrical generators were not included in the application.

Permitting History
The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

October 17, 2011 P-2011.0099, Permit modification to replace the existing wet scrubber with a Gencor pulse-jet baghouse, Permit status (A, but will become S upon issuance of this permit)

April 17, 2001 777-00281, Initial permit for a portable HMA plant, Permit status (S)

Application Scope
The Applicant has proposed to change out the existing parallel-flow drum dryer with a new counter-flow drum dryer with the same 200 T/hr throughput capacity. Note: The production rate will continue to be limited to 134 T/hr production limit. In addition, the facility is requesting that the capability to use up to 50% RAP be allowed since there is no change in emissions with this amount of RAP usage.

Application Chronology
December 9, 2014 DEQ received an application and an application fee.
January 7, 2015 DEQ determined that the application was complete.
February 24, 2015 DEQ made available the draft permit and statement of basis for peer and regional office review.
March 5, 2015 DEQ made available the draft permit and statement of basis for applicant review.
March 16, 2015 DEQ received the permit processing fee.
April 1, 2015 DEQ issued the final permit and statement of basis.
TECHNICAL ANALYSIS

The asphalt production facility utilizes a baghouse for control of particulate matter emissions from the asphalt drum mixer. In addition, the Applicant will use other emissions controls to minimize PM_{10} emissions from aggregate handling.

**Emissions Units and Control Equipment**

<table>
<thead>
<tr>
<th>Source ID No.</th>
<th>Sources</th>
<th>Control Equipment</th>
<th>Emission Point ID No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials Handling</td>
<td>Material Transfer Points: Materials handling, Asphalt aggregate transfers, Truck unloading of aggregate, Aggregate conveyor transfers, Aggregate handling</td>
<td>Fugitive Emissions Controls</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Emissions Inventories**

**Potential to Emit**

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

For this permit revision potential to emit calculations were not performed as it was assumed hourly and annual emissions were staying the same as a result of this project since there was no proposed change in hourly or annual throughput. The facility is currently permitted at 3.11 lb-PM_{10}/hr, 6.1 T-PM_{10}/yr, and 56 T-CO/yr.

**Ambient Air Quality Impact Analyses**

An Ambient Air Quality Impact Analysis was not performed for this project because it was assumed all criteria pollutant emissions were staying the same as a result of this project.

**REGULATORY ANALYSIS**

**Attainment Designation (40 CFR 81.313)**

This HMA plant is currently permitted to operate as portable throughout the state and it was previously allowed to operate in non-attainment areas with certain limitations. These requirements will be included with this new permit because as discussed previously a modeling analysis was not performed for this project. These previous permit requirements are included as Permit Conditions 1.8 and 2.6.
Facility Classification
This facility was previously classified as “Synthetic Minor” for PM\(_{10}\) emissions because PM\(_{10}\) emissions would exceed 100 tons per year without controls or enforceable permit limits. There is no change is permitted emissions as a result of this project. Therefore, this facility will continue to be classified as “Synthetic Minor” for PM\(_{10}\) emissions.

Permit to Construct (IDAPA 58.01.01.201)
IDAPA 58.01.01.201  Permit to Construct Required
The permittee has requested that a PTC be issued to the facility for the proposed modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)
IDAPA 58.01.01.401  Tier II Operating Permit
The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)
IDAPA 58.01.01.625  Visible Emissions
The sources of PM\(_{10}\) emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.5.

Fugitive Emissions (IDAPA 58.01.01.650)
IDAPA 58.01.01.650  Rules for the Control of Fugitive Emissions
The sources of fugitive emissions at this facility are subject to the State of Idaho fugitive emissions standards. These requirements are assured by Permit Conditions 1.4, 1.5, and 1.10.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)
IDAPA 58.01.01.701  Particulate Matter – New Equipment Process Weight Limitations
IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment’s process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following four equations:

IDAPA 58.01.01.701.01.a:  If PW is < 9,250 lb/hr; E = 0.045 (PW\(^{0.60}\))
IDAPA 58.01.01.701.01.b:  If PW is ≥ 9,250 lb/hr; E = 1.10 (PW\(^{0.25}\))

For equipment that commenced prior to October 1, 1979, the PM allowable emission rate is based on one of the following equations:

IDAPA 58.01.01.702.01.a:  If PW is < 17,000 lb/hr; E = 0.045 (PW\(^{0.60}\))
IDAPA 58.01.01.702.01.b:  If PW is ≥ 17,000 lb/hr; E = 1.12 (PW\(^{0.27}\))

For the modified asphalt drum mixer emissions unit proposed to be installed as a result of this project with a proposed throughput of 134 T/hr, E is calculated as follows:
Proposed throughput = 134 T/hr x 2,000 lb/1 T = 268,000 lb/hr

Therefore, E is calculated as:

\[ E = 1.10 \times PW^{0.25} = 1.10 \times (268,000)^{0.25} = 25.0 \text{ lb-PM/hr} \]

As discussed previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 3.11 lb-PM_{10} per hour. Assuming PM is 50% PM_{10} means that PM emissions will be 6.22 lb-PM/hr (3.11 lb-PM_{10} per hour ÷ 0.5 lb-PM_{10} per lb-PM). This is less than the calculated Rule requirement PM emissions rate of 25.0 lb-PM/hr. Therefore, compliance with this requirement has been demonstrated.

**Rules for Control of Odors (IDAPA 58.01.01.775)**

IDAPA 58.01.01.750    Rules for Control of Odors

Section 776.01 states that no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution. These requirements are assured by Permit Conditions 1.9 and 1.12.

**Rules for Control of Hot-Mix Asphalt Plants (IDAPA 58.01.01.805)**

IDAPA 58.01.01.805    Rules for Control of Hot-Mix Asphalt Plants

The purpose of Sections 805 through 808 is to establish for hot-mix asphalt plants restrictions on the emission of particulate matter.

Section 806 states that no person shall cause, allow or permit a hot-mix asphalt plant to have particulate emissions which exceed the limits specified in Sections 700 through 703. As demonstrated previously, these requirements have been met by the proposed PM_{10} emissions rate (see Section on Particulate Matter – New Equipment Process Weight Limitations).

Section 807 states that in the case of more than one stack to a hot-mix asphalt plant, the emission limitation will be based on the total emission from all stacks. The proposed facility only has one stack for emissions from the asphalt drum dryer so there is no need to combine emissions limits from multiple stacks into one stack as required.

Section 808.01 requires fugitive emission controls as follows: No person shall cause, allow or permit a plant to operate that is not equipped with an efficient fugitive dust control system. The system shall be operated and maintained in such a manner as to satisfactorily control the emission of particulate material from any point other than the stack outlet.

Section 808.02 requires plant property dust controls as follows: The owner or operator of the plant shall maintain fugitive dust control of the plant premises and plant owned, leased or controlled access roads by paving, oil treatment or other suitable measures. Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as stockpiling, screen changing and general maintenance.

These requirements are assured by Permit Conditions 1.4 and 1.5.

**Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.301    Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for any criteria pollutant or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as determined previously for initial permit 777-00303. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.
PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

Because the facility produces asphalt the following NSPS Subparts are applicable:

- 40 CFR 60, Subpart I - National Standards of Performance for Hot Mix Asphalt Plants

Those sections that are applicable are highlighted.

40 CFR 60, Subpart I National Standards of Performance for Hot Mix Asphalt Plants

This permitting action is for a new asphalt plant. Therefore, the requirements of this subpart may apply.

§ 60.90 Applicability and designation of affected facility

In accordance with §60.90(a), each hot mix asphalt facility is an affected facility. In accordance with §60.90(b), any hot mix asphalt facility that commences construction or modification after June 11, 1973 is subject to the requirements of Subpart I.

The affected facility includes: the dryer; systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler; systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems.

§ 60.91 Definitions

This section contains the definitions of this subpart.

§ 60.92 Standard for particulate matter

In accordance with §60.92, no owner or operator shall discharge or cause the discharge into the atmosphere from any affected facility any gases which contain particulate matter in excess of 0.04 gr/dscf or exhibit 20% opacity or greater. Permit Condition 2.4 includes the requirements of this section.

§ 60.93 Test methods and procedures

In accordance with §60.93(a), performance tests shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60.

In accordance with §60.93(b), compliance with the particulate matter standards shall be determined by EPA Reference Method 5, and opacity shall be determined by EPA Reference Method 9. This is an existing HMA plant that was permitted in 2001 and modified in 2011 and the initial Subpart I source test has been performed on this asphalt plant. Because this is not defined as a “modification” in this subpart the initial source test is not required.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility is not subject to any NESHAP requirements in 40 CFR 63.
Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Permit condition 1.1 establishes the permit to construct scope.

Permit condition 1.3 explains which previous permit for the facility is being replaced as a result of this project.

Permit condition, Table 1.1, provides a description of the purpose of the permit and the regulated sources, the process, and the control devices used at the facility.

FACILITY-WIDE CONDITIONS

As discussed previously, permit condition 1.4 establishes that the permittee shall take all reasonable precautions to prevent fugitive particulate matter (PM) from becoming airborne and provides examples of the controls in accordance with IDAPA 58.01.01.650-651.

As discussed previously, permit condition 1.5 establishes that the asphalt plant shall employ efficient fugitive dust controls and provides examples of the controls in accordance with IDAPA 58.01.01.808.01 and 808.02.

Permit condition 1.6 establishes that the asphalt plant may collocate with one portable rock crushing plant, one portable concrete batch plant, or one other portable hot mix asphalt plant when operating within attainment or unclassified areas and the other plant is permitted to specifically allow collocation. This requirement was carried over from the previous permit.

Permit condition 1.7 establishes that the permittee notify DEQ when the permitted portable equipment is relocated. This requirement is based upon imposing reasonable permit conditions for portable asphalt plants.

Permit condition 1.8 establishes throughput limits when operating in PM$_{10}$ non-attainment areas or proposed PM$_{10}$ non-attainment areas. This requirement was carried over from the previous permit.

Permit condition 1.9 establishes that there are to be no emissions of odorous gases, liquids, or solids from the permit equipment into the atmosphere in such quantities that cause air pollution.

As discussed previously, permit condition 1.10 establishes that the permittee shall monitor fugitive dust emissions on a daily basis to demonstrate compliance with the facility-wide permit requirements.

Permit condition 1.11 establishes that the permittee measure and record the distances to equipment that will be collocated with the asphalt plant to demonstrate compliance with the Collocation Restrictions permit condition.

Permit condition 1.12 establishes that the permittee monitor and record odor complaints to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 1.13 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

ASPHALT PRODUCTION EQUIPMENT

Permit condition 2.1 provides a process description of the asphalt production process at this facility.

Permit condition 2.2 provides a description of the control devices used on the asphalt production equipment at this facility.

Permit condition 2.3 establishes hourly and annual emissions limits for PM$_{10}$ and an annual emissions limit for CO emissions from the asphalt production operation at this facility. This requirement was carried over from the previous permit.

As discussed previously permit condition 2.4 incorporates the particulate matter and opacity standards of 40 CFR 60, Subpart I – Standards of Performance for Hot Mix Asphalt Plants.

As discussed previously, Permit Condition 2.5 establishes a 20% opacity limit for the asphalt drum mixer baghouse stack, the load-out station stack(s), and the silo filling slat conveyor stacks or functionally equivalent openings associated with the asphalt production operation.
Permit Condition 2.6 establishes a daily and an annual asphalt production limit for the asphalt production operation in different attainment areas. This requirement was carried over from the previous permit.

Permit Condition 2.7 establishes limits for the raw materials used in the asphalt production operation as proposed by the Applicant.

Permit Condition 2.8 establishes that a baghouse be used to control emissions from the asphalt drum mixer as proposed by the Applicant.

Permit Condition 2.9 establishes fuel use restrictions for combustion in the asphalt drum mixer. This fuel use restriction was based on the fuels proposed by the Applicant to be combusted in the asphalt drum mixer.

Permit Condition 2.10 establishes PM₁₀ performance testing requirements required by DEQ on asphalt plants located in the state of Idaho.

Permit Condition 2.11 establishes PM₁₀ performance testing methods and procedures required by DEQ on asphalt plants located in the state of Idaho.

Permit condition 2.12 establishes that the permittee monitor asphalt production, visible emissions, RAP percentage usage, and the fuel combusted in the asphalt drum mixer during the performance tests to establish the validity of the performance tests.

Permit condition 2.13 establishes that the Permittee monitor and record hourly and daily asphalt production to demonstrate compliance with the Asphalt Production Limits permit condition.

Permit condition 2.14 establishes that the Permittee calculate and record RAP use to demonstrate compliance with the Allowable Raw Materials permit condition.

Permit condition 2.15 establishes that the Permittee shall establish procedures for operating the baghouse. This is a DEQ imposed standard requirement for operations using baghouses to control particulate emissions.

Permit Condition 2.16 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

Permit Condition 2.17 establishes that the permittee shall submit the results of the performance tests to the appropriate DEQ office.

Permit condition 2.18 establishes that the federal requirements of 40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Plants, are incorporated by reference into the requirements of this permit per current DEQ guidance.


PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.
APPENDIX A – PROCESSING FEE
PTC Fee Calculation

Instructions:
Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Lakeside Industries dba Valley Paving
Address: P.O. Box 775
City: Bellevue
State: ID
Zip Code: 83313
Facility Contact: Karen Deal
Title: Environmental & Land Use Director
AIRS No.: 777-00281

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

<table>
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<th>Pollutant</th>
<th>Annual Emissions Increase (T/yr)</th>
<th>Annual Emissions Reduction (T/yr)</th>
<th>Annual Emissions Change (T/yr)</th>
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Comments:
APPENDIX B – FACILITY DRAFT COMMENTS
The following comments were received from the facility on March 10, 2015:

**Facility Comment:** Permit Condition 2.5, Opacity Limit - There is no stack on the slat conveyor or load-out silos.

**DEQ Response:** The requested change will be made to the permit.

**Facility Comment:** Permit Condition 2.8, Baghouse System Control Equipment - 100% of the baghouse fines cannot be incorporated into new mix due to quality and state specifications.

**DEQ Response:** The requested change will be made to the permit.