STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

January 25, 2019

Mr. Randy Turnage, President
TMC INC
2984 East Lincoln Road
Idaho Falls, ID 83401

RE: Facility ID No. 019-00024, TMC INC, Idaho Falls
Final Permit Letter

Dear Ms. Turnage:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2009.0017 to TMC INC to include a new asphalt production limit of 183 T/hr. (see permit conditions 2.5 and 2.15) established during performance testing in the previously issued permit, and in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). In addition, Table 1.1 has been updated to include installation of "Lazy Stack" control equipment prior to 2018 Performance Testing.

This permit revises PTC No. P-2009.0017, issued on April 22, 2016. Please replace the existing copy of your permit with the enclosed, revised permit. This permit does not release TMC INC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\wt

Permit No. P-2009.0017 PROJ 62169

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	TMC INC
Permit Number	P-2009.0117
Project ID	62169
Facility ID	019-00024
Facility Location	2486 North 25th East Idaho Falls, Idaho 83401

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued January 25, 2019

Will Tiedemann, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) to include a new asphalt production limit based on the results of 2018 performance testing.

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.

1.3 This PTC replaces Permit to Construct No. P-2009.0117, issued on April 22, 2016.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source		Control Equipment	
2	HMA Plant Parallel flow drum mix Manufacturer: Model: Maximum asphalt production: Annual asphalt production: Burner fuel type: Maximum burner fuel usage rate: Installed Date:	 Custom built Genco FP-162 250 T/hr 40,000 T/yr Propane 450 gallons/hr 1988	Venturi Scrubber and Lazy Stack Manufacturer: Model:	 Custom built Genco FP-162

[1/25/2019]

2 Hot-Mix Asphalt Plant

2.1 Process Description

A front end loader is used to transfer aggregate from the aggregate stockpile to a cold feed hopper which feeds a conveyor. The conveyor transfers aggregate to a drum mix dryer with a maximum rated capacity of 250 tons per hour. The dryer is fired by propane. Asphalt oil is added approximately 2/3 of the way down the asphalt dryer. Finished asphalt is transferred by drag conveyor to a storage silo. Finished asphalt drops from the silo into trucks, and is then taken off the plant site.

Electrical power for the plant is provided by the local electric utility.

This permit pertains to the following equipment:

- Aggregate belt conveyor
- Cold feed hopper
- Genco FP-162 drum mix dryer
- Venturi scrubber, with stack 40 feet high and 3 feet in diameter
- Drag conveyor
- Silo

2.2 Control Device Descriptions

Table 2.1 Emission Controls Description

Emissions Units / Processes	Control Devices	Emission Points
Drum Mix Dryer	Venturi Scrubber and Lazy Stack	Scrubber/Lazy Stack Exhaust Outlet
Fugitive Dust	Application of Dust Suppressant	Not Applicable
Aggregate Hoppers and Conveyors	None	Not Applicable

Emission Limits

2.3 Emission Limits

- Particulate matter (PM) emissions from the drum mix dryer stack shall not exceed 0.04 grains per dry standard cubic feet of effluent gas, as specified in 40 CFR 60.92.
- Annual PM emissions shall not exceed five tons per year, as determined by multiplying the actual emission rate (measured by an approved emissions test) or the allowable emission rate (if actual is not available) by the actual hours of operation per year recorded in accordance with Permit Condition 2.15.

2.4 Opacity Limit

Emissions from the drum mix dryer stack, or any other stack, vent, or functionally equivalent opening associated with the drum mix dyer, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Asphalt Production Limits

Asphalt production from this facility shall not exceed 183 tons per hour.

[1/25/2019]

2.6 Reasonable Control of Fugitive Emissions

- In accordance with IDAPA 58.01.01.650 and 651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following, where practical:
  - Using water or chemicals for dust control in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Covering dirt roads, material stockpiles, and other surfaces which can create dust, or applying asphalt, water, or suitable chemicals to them.
  - Installing and using hoods, fans, and fabric filters or equivalent systems to enclose and vent dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering open-bodied trucks that transport materials likely to give rise to airborne dusts.
  - Paving roadways and maintaining them in a clean condition.
  - Promptly removing earth or other stored material from streets.
- In accordance with IDAPA 58.01.0.808:
  - 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.
  - 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.
- A chemical dust suppressant shall be applied to all the unpaved roads associated with this process.

2.7 Monitoring Equipment for Wet Venturi Scrubber Operation

The permittee shall, in accordance with manufacturer specifications, install, calibrate, maintain, and operate equipment to continuously measure the pressure differential across the wet venturi scrubber and the scrubbing-media flow rate to the wet venturi scrubber.

[1/22/2010]

2.8 Venturi Scrubber Operations and Maintenance Manual

The permittee shall develop an operations and maintenance (O&M) manual for the venturi scrubber. Once developed, a copy of the manual shall be submitted for review and comment to DEQ's Idaho Falls Regional Office at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 N. Skyline, Suite B.
Idaho Falls, ID 83402

The O&M manual shall include, but not be limited to, the following:

- Be based on manufacturer's information to the extent practical. When the manufacturer's information is not used, other supporting information such as operating parameters measured during a successful performance test shall be included in the manual.
- List the manufacturer's recommended pressure drop operating range and scrubbing media flow rate range for effective PM emissions control for the venturi scrubber.
- Include an inspection checklist that lists the scrubber components that will be inspected when the venturi scrubber is taken out of operation and physically inspected (e.g., condition of water spray nozzles, condition of seals, scrubbing media flow meter, etc.).
- Include the frequency that the physical inspections are to occur.
- Include a record of the results of each inspection and any corrective action taken in response to the results of the inspection.

The permittee shall maintain the O&M manual on site at all times and the O&M manual shall be made available to DEQ representatives upon request.

[1/22/2010]

2.9 Venturi Scrubber Pressure Drop

The pressure drop across the venturi scrubber shall be maintained in accordance with the specifications in the O&M manual.

[1/22/2010]

2.10 Venturi Scrubber Flow Rate

The scrubbing-media flow rate to the venturi scrubber shall be maintained in accordance with the specifications in the O&M manual.

[1/22/2010]

2.11 Venturi Scrubber Operation

The venturi scrubber shall be operated at all times during the operation of the drum dryer and in accordance with O&M manual.

[1/22/2010]

2.12 Permitted Fuels

The fuels used in the drum dryer shall be propane, or No.2 fuel oil (American Society for Testing and Materials ASTM Grade 2 fuel oil.)

[1/22/2010]

2.13 Fuel Sulfur Content

In accordance with IDAPA 58.01.01.725, the permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 2 fuel oil - 0.5% by weight.

[1/22/2010]

2.14 Odors

In accordance with IDAPA 58.01.01.775-776, the permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

[1/22/2010]

Monitoring and Recordkeeping Requirements

2.15 Asphalt Production Recordkeeping

For each day that the asphalt drum mixer is operated the Permittee shall maintain the following records:

- The amount of asphalt produced in tons per hour and tons per day to demonstrate compliance with the hourly Asphalt Production Limits permit condition.

[1/25/2019]

2.16 Reasonable Fugitive Emissions Control Measures

In any month while HMA is produced, the permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each fugitive emissions inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken. The monthly inspection is not required when the facility is not in operation. Records of each facility-wide fugitive emissions inspection shall remain on-site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[1/22/2010]

2.17 Operating Parameters

The following parameters shall be monitored and recorded based on the frequency indicated below:

- Pressure drop across the venturi scrubber at least once per day while HMA is being produced
- The scrubbing-media flow rate to the venturi scrubber at least once per day while HMA is being produced
- Hours of facility operation on a daily, monthly, and annual basis.

[1/22/2010]

2.18 Fuel Oil Sulfur Content Monitoring

The permittee shall maintain purchase records or equivalent from the supplier that show the sulfur content of the fuel oil delivered to the facility on an as-received basis.

[1/22/2010]

2.19 Odor Complaints

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

[1/22/2010]

2.20 Performance Testing Requirements

After issuance of this permit, the permittee shall conduct performance tests at a frequency of no less than once every five years to demonstrate compliance with the PM grain loading emissions limit and the opacity emissions limit.

A performance test shall be conducted on the hot-mix drum dryer under worst-case normal operating conditions in accordance with 40 CFR 60.93, IDAPA 58.01.01.157, and Performance Testing specified in General Provisions.

The following shall be monitored and recorded during the performance tests:

- The hourly asphalt production rate expressed as tons per hour
- Burner fuel type (i.e., propane or No. 2 distillate fuel oil)
- Burner fuel flow rate (i.e., gallons per hour)
- Fuel oil sulfur content (i.e., percent by weight) if fuel oil is used
- Pressure drop across the venturi scrubber (i.e., inches of water)
- The water flow rate to the venturi scrubber (i.e., gallons per minute)
- The visible emissions observed during the performance tests

[1/22/2010]

Reporting Requirements

2.21 Performance Test Reporting

Performance test reports shall include records of the monitoring required by this permit during the test and documentation that the performance test was conducted under worst-case normal operating conditions and in accordance with IDAPA 58.01.01.157. Performance test reports shall be submitted by the permittee to the following address:

Air Quality Permit Compliance
Idaho Department of Environmental Quality
Idaho Falls Regional Office
900 N. Skyline, Suite B
Idaho Falls, ID 83402

Phone: (208) 528-2650
Fax: (208) 528-2695

[1/22/2010]

3 General Provisions

General Compliance

3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted

then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]