



**Air Quality Permitting  
Statement of Basis**

**April 24, 2006**

**Permit to Construct No. P-050037**

**Western Construction, Incorporated  
Boise, ID**

**Facility ID No. 777-00212**

Prepared by:

Shawnee Chen, P.E., Senior Engineer  
AIR QUALITY DIVISION

**FINAL**

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## Acronyms, Units, and Chemical Nomenclatures

AACC	acceptable ambient concentration of carcinogenic
ACC	acceptable ambient concentration of non-carcinogenic
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
Btu/hr	British thermal unit per hour
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EI	emissions inventory
EPA	U.S. Environmental Protection Agency
gal/hr	gallon per hour
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic feet
HAPs	Hazardous Air Pollutants
HMA	hot-mix asphalt
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PAH	polyaromatic hydrocarbons
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SIC	Standard Industrial Classification
SM	Synthetic Minor
SO <sub>2</sub>	sulfur dioxide
TAP	toxic air pollutant
T/yr	tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
VOC	volatile organic compound

## 1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

## 2. FACILITY DESCRIPTION

This portable hot mix asphalt (HMA) facility produces asphalt. Stockpiled aggregate and soil fines are conveyed to a rotary kiln drum drier where they are dried, heated, and combined with asphalt cement to produce asphalt. The asphalt is either loaded to trucks for transport off site, or transferred to silos for temporary storage.

## 3. FACILITY / AREA CLASSIFICATION

Western Construction Inc. is not a major facility as defined in IDAPA 58.01.01.205, nor is it a designated facility as defined in IDAPA 58.01.01.006.27. The potential to emit of any criteria air pollutant is below 100 T/yr, and potential emissions rates for HAPs are below 25 T/yr collectively, and less than 10 T/yr for any single HAP. The primary Standard Industrial Classification (SIC) code for the facility is 2951. The facility is defined as a synthetic minor (SM) facility because, without using the control system to control the particulates and without permit limit on the potential to emit of CO, the PM<sub>10</sub> and CO emissions would exceed 100 tons per year. The AIRS classification is "SM".

The facility is a portable facility and may locate anywhere in the state of Idaho except for nonattainment areas.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant for Western Construction. This information is entered into the EPA AIRS database.

## 4. APPLICATION SCOPE

Western Construction has applied for burning used oil in the HMA drum dryer, which wasn't permitted in the existing PTC. In addition, as a result of DEQ policy updates, the following changes are made to the permit: 1)The facility shall not collocate with another HMA plant; and 2)The facility shall conduct performance testing on the drum dryer every five years in addition to performance test required by 40 CFR 60.8.

### 4.1 *Application Chronology*

August 10, 2005	The permit to construct application was received by DEQ.
August 29, 2005	The permit application was declared active.
September 28, 2005	The permit application was declared complete.
March 1, 2006	Additional information, including asphalt tank heater, was received.
March 29, 2006	The draft permit was issued to Western Construction for facility review.
April 21, 2006	DEQ received the facility's comments on the draft permit

## 4.2 Permit Chronology

- PTC No. 777-00212, issued February 13, 1998, was the initial permit for the HMA plant.
- PTC No. 777-00212; issued June 25, 1999, allowed the facility to collocate in NAAQS attainment areas.
- PTC No. 777-00212, issued June 16, 2000, was issued in conjunction with a facility fugitive dust control plan.

## 5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action:

### 5.1 Equipment Listing

There is no change to the equipment since last permit issued June 16, 2000 except for the electric generator. The rated fuel rate of current generator is 54 gal/hr. It is the replacement of original generator set due to the generator set equipment failure. However, to be conservative and allow for future equipment replacement up to the original fuel rate, the analysis for this PTC modification is based on fuel rate of 67.7 gal/hr.

The information on the asphalt tank heater is provided in March 1, 2006 submittal. It is added here because it was not included in the former PTC memorandum.

#### Asphalt Tank Heater

Manufacturer:	Power Flame
Rated heat input capacity:	520,000 Btu/hr
Maximum amount burned/hr:	4 gal/hr
Burner fuel type:	No.2 diesel oil

#### Stack Information

Stack height:	10.6 feet
Stack diameter:	0.92 feet
Stack flowrate:	254 acfm
Stack temperature:	650 °F

### 5.2 Emissions Inventory

A detailed emissions inventory (EI) was provided in the application. The EI has been reviewed by DEQ and appears to accurately reflect emissions from the facility. Tables 5.1, 5.2, and 5.3 provide a summary of EIs for criteria pollutants when the HMA is stand alone in an attainment/unclassifiable area, or collocated with another portable source in an attainment/unclassifiable area, or stand alone in a non-attainment area. The facility's EI can be found in Appendix B of the statement of basis.

**Table 5.1 EMISSION SUMMARY – NONCOLLOCATED IN ATTAINMENT AREA**

Pollutant	Emissions (T/yr)			Facility Total
	HMA Dryer	Generator	Asphalt Tank Heater	
CO	86.04	12.96	0.021	99.02
NO <sub>x</sub>	36.40	48.78	0.35	85.53
PM <sub>10</sub>	15.22	0.87	0.023	16.11
SO <sub>2</sub>	38.39	7.77	1.24	47.40
VOC	21.18	1.25	5.96E-03	22.44
TAPS	10.62	0.01	3.26E-11	10.63

**Table 5.2 EMISSION SUMMARY – COLLOCATED IN ATTAINMENT AREA**

Pollutant	Emissions (T/yr)			Facility Total
	HMA Dryer	Generator	Asphalt Tank Heater	
CO	43.02	6.48	0.021	49.52
NO <sub>x</sub>	18.20	24.39	0.35	42.94
PM <sub>10</sub>	7.61	0.44	0.023	8.07
SO <sub>2</sub>	19.19	3.89	1.24	24.32
VOC	10.59	0.62	5.96E-03	11.22
TAPS	< 10.62	< 0.01	3.26E-11	< 10.63

**Table 5.3 EMISSION SUMMARY – NONCOLLOCATED IN NONATTAINMENT AREA**

Pollutant	Emissions (T/yr)			Facility Total
	HMA Dryer	Generator	Asphalt Tank Heater	
CO	85.33	12.85	0.021	99.02
NO <sub>x</sub>	36.40	48.37	0.35	85.53
PM <sub>10</sub>	15.10	0.87	0.023	16.11
SO <sub>2</sub>	38.07	7.71	1.24	47.40
VOC	21.00	1.24	5.96E-03	22.44
TAPS	< 10.62	< 0.01	3.26E-11	< 10.63

### 5.3 Modeling

The facility has demonstrated compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The facility's modeling analysis can be found in Appendix C of the statement of basis. A summary of the modeling analysis is presented in Tables 5.4 and 5.5.

**Table 5.4 FULL IMPACT ANALYSIS RESULTS**

Pollutant	Averaging Period	Facility Ambient Impact (µg/m <sup>3</sup> )	Background concentration (µg/m <sup>3</sup> )	Total Ambient Concentration (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Percent of NAAQS
CO	1-hr	160	3600	3760	40000	9%
	8-hr	112	2300	2412	10000	24%
Lead	Quarterly	1.13E-03	0.03	0.03	1.5	2%
NO <sub>2</sub>	Annual	12	17	29	100	29%
PM <sub>10</sub>	24-hr	8	73	81	150	54%
	Annual	0.7	26	27	50	53%
SO <sub>2</sub>	3-hr	140	34	174	1300	13%
	24-hr	62	26	88	365	24%
	Annual	8.3	8	16	80	20%

**Table 5.5 FULL IMPACT ANALYSIS RESULTS FOR TAPS INCREMENT**

Pollutant	Average period	Concentration (µg/m <sup>3</sup> )	Regulatory Limit (µg/m <sup>3</sup> ) AAC	Regulatory Limit (µg/m <sup>3</sup> ) AACC	Percent of Limit
Acetaldehyde	Annual	0.286	---	0.45	0.80%
HCl	24 hour	0.122	375	---	0.03%
Propionaldehyde		0.076	21.5		0.35%
Quinone		0.093	20		0.47%

## 5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC modification.

### IDAPA 58.01.01.201 ..... Permit to Construct Required

This facility has applied to burn used oil in their HMA drum dryer. The proposed change is a modification in accordance with 40 CFR 60.14 and IDAPA 58.01.01.006.56. The proposed change does not qualify for an exemption under Sections 220 through 223 of the Rules; therefore, a Permit to Construction is required.

### IDAPA 58.01.01.203.02 ..... NAAQS

“No permit to construct shall be granted for a new or modified stationary source unless the applicant shows to the satisfaction of the Department all of the following:....02. NAAQS....”

The facility has demonstrated compliance, to DEQ’s satisfaction, that this project will not cause or significantly contribute to a violation of any ambient air quality standards of CO, lead, PM<sub>10</sub>, NO<sub>2</sub>, and SO<sub>2</sub>. The summary of the modeling analysis is in Table 5.4.

### IDAPA 58.01.01.203.03 ..... Toxic Air Pollutants (TAP)

“No permit to construct shall be granted for a new or modified stationary source unless the applicant shows to the satisfaction of the Department all of the following:....03. Toxic Air Pollutants Using the methods provided in Section 210, the emissions of toxic air pollutants from the stationary source or modification would not injure or unreasonably affect human or animal life or vegetation as required by Section 161. Compliance with all applicable toxic air pollutant carcinogenic increments and toxic air pollutant non-carcinogenic increments will also demonstrate preconstruction compliance with Section 161 with regards to the pollutants listed in Sections 585 and 586.”

The permittee proposed to operate the emissions units as they were permitted in June 16, 2000 PTC except for the drum dryer. The applicant has applied for burning used oil in the drum dryer that was not originally permitted in the June 16, 2000 permit. This is a modification. The TAP increment analysis has been conducted for this modification. The detailed analysis can be found in Appendix B. The emissions of Acetaldehyde, HCl, Propionaldehyde, and Quinone exceeded their respective screen emissions levels. These TAPs were modeled. The modeled ambient concentrations were less than their respective acceptable ambient concentrations for non-carcinogens and acceptable ambient concentrations for carcinogens. Therefore, the facility is in compliance with IDAPA 58.01.01.203.03.

## **IDAPA 58.01.01 675..... Fuel Burning Equipment**

This regulation establishes particulate matter emission standards (grain loading standards) for fuel burning equipment. Fuel burning equipment is defined in IDAPA 58.01.01.006.41 as, “*Any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer.*”

Per the information in March 1, 2006 submittal, the asphalt tank heater burner heats the asphalt oil indirectly. This regulation is applicable to the tank heater. The calculated result in the submittal demonstrates that the tank heater is in compliance with the grain loading standard. No specific monitoring requirement is needed.

## **40 CFR 60 Subpart I..... New Source Performance Standards**

Western Construction’s HMA is subject to 40 CFR 60 Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, and Subpart A, General Provision of 40 CFR 60. The facility has applied to burn used oil in their HMA drum dryer. The proposed change is a modification in accordance with 40 CFR 60.14. The modification triggers the facility to conduct performance test when the used oil is burned in the HMA drum dryer.

### **5.5 Permit Conditions Review**

This section describes only those permit conditions that have been revised, modified, or deleted as a result of this permit action. All other permit conditions remain unchanged.

- 5.5.1 Permit Conditions 1.1, 1.2 and 1.3 are added to state the purpose of this permit modification.
- 5.5.2 Table 1.1 is added to summarize the regulated emissions units.
- 5.5.3 Permit Conditions 2.1 and 2.2 are added to provide the general description for HMA plant and air pollution control equipment.
- 5.5.4 Emissions limits in Permit Condition 3.4 (former Permit Condition A.1.1 and Appendix A) are revised as they are affected by burning used oil. To ensure compliance with these limits, the following requirements are included in the permit:
  - Operating requirements of hot-mix asphalt production and operation hours of the electric generator in Permit Condition 3.7.
  - Monitoring requirements of hot-mix asphalt production rates and operation hours of the electric generator in Permit Condition 3.13.
  - Operating requirements of air pollution control equipment in Permit Condition 3.8. Permit Condition 3.8.1 is added to require the operation of the drum dryer baghouse during drum dryer operation because all the emissions estimations are based on this operation requirement.
  - Monitoring requirements of air pollution control equipment in Permit Condition 3.14.
  - Operating requirements of fuel types used in HMA plant in Permit Condition 3.10
- 5.5.5 The toxic air pollutants are addressed through this permit action. Per IDAPA 58.01.01.210.08, Permit Condition 3.5 is added to limit emissions of toxic air pollutants that their controlled ambient concentrations meet the respective AACs, or AACCs.
- 5.5.6 Permit Conation 3.7 is added to provide general requirements for the asphalt production rates and the operation hours of the electric generator under different operation scenario.



- 5.5.7 Permit Condition 3.10 is added to replace the former Permit Condition A.2.2. Permit Condition 3.10 specifies fuel types used in the drum dryer, the electric generator, and the asphalt tank heater. The residual fuel oil in former Permit Condition A.2.2 is removed because it was mistakenly included, and no analysis on this fuel was conducted.
- 5.5.8 The language from the current template is used to in Permit Condition 3.12 to replace former Permit Condition A.3.5 for opacity monitoring.
- 5.5.9 Per current policy, the HMA plant cannot collocate with another HMA plant. Permit Condition 3.11 addresses this requirement.
- 5.5.10 Permit Condition 3.15 requires the permittee to conduct performance testing when the drum dryer is fired by used oil. In addition, per current policy, Permit Condition 3.15.2 requires the permittee to conduct source test at a frequency of no less than once every five years.
- 5.5.11 General provisions are replaced with the version in the current template.

## **6. PERMIT FEES**

Western Construction submitted a \$1,000 PTC application fee on August 10, 2005, in accordance with IDAPA 58.01.01.224. Western Construction is subject to a \$500 processing fee in accordance with IDAPA 58.01.01.225 as a General Permit. DEQ received \$500 on April 11, 2006.

## **7. PERMIT REVIEW**

### **7.1 *Regional Review of Draft Permit***

The Boise regional office was provided an opportunity to comment on the draft permit on March 29, 2006. The comments were received on April 3, 2006 and addressed in the permit.

### **7.2 *Facility Review of Draft Permit***

Western Construction was provided an opportunity to comment on the draft permit on March 29, 2006. The comments were received on April 21, 2006 and addressed in the permit.

### **7.3 *Public Comment***

An opportunity for public comment period on the PTC application was provided from October 14, 2005, to November 14, 2005, in accordance with IDAPA 58.01.01.209.01.c. During this time, there were not comments on the application, and no requests for a public comment period on DEQ's proposed action.

## **8. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Western Construction, Inc. be issued final PTC No. P-050037 for the hot mix asphalt plant to burn used oil. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

SYC/bf            Permit No. P-050037

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**Appendix A**

***AIRS Information***

**P-050037**

## AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** Western Construction, Inc.  
**Facility Location:** Portable Asphalt Plant  
**AIRS Number:** 777-00212

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							Portable
NO <sub>x</sub>	B							Portable
CO	SM						SM80	Portable
PM <sub>10</sub>	SM							Portable
PT (Particulate)	SM		SM					Portable
VOC	B							Portable
THAP (Total HAPs)	B							Portable
<b>APPLICABLE SUBPART</b>								
I								

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

**Appendix B**

***Emissions Inventory***

**P-050037**



PTC Statement of Basis  
 Western Construction Inc.  
 1000 West Broadway  
 Boise, Idaho 83725  
 Telephone: (208) 333-1111  
 Fax: (208) 333-1112  
 E-mail: info@westernconstruction.com  
 Website: www.westernconstruction.com

Account	Balance
1000	1000
1010	1010
1020	1020
1030	1030
1040	1040
1050	1050
1060	1060
1070	1070
1080	1080
1090	1090
1100	1100
1110	1110
1120	1120
1130	1130
1140	1140
1150	1150
1160	1160
1170	1170
1180	1180
1190	1190
1200	1200
1210	1210
1220	1220
1230	1230
1240	1240
1250	1250
1260	1260
1270	1270
1280	1280
1290	1290
1300	1300
1310	1310
1320	1320
1330	1330
1340	1340
1350	1350
1360	1360
1370	1370
1380	1380
1390	1390
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1600	1600
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1780	1780
1790	1790
1800	1800
1810	1810
1820	1820
1830	1830
1840	1840
1850	1850
1860	1860
1870	1870
1880	1880
1890	1890
1900	1900
1910	1910
1920	1920
1930	1930
1940	1940
1950	1950
1960	1960
1970	1970
1980	1980
1990	1990
2000	2000

Account	Balance
2000	2000
2010	2010
2020	2020
2030	2030
2040	2040
2050	2050
2060	2060
2070	2070
2080	2080
2090	2090
2100	2100
2110	2110
2120	2120
2130	2130
2140	2140
2150	2150
2160	2160
2170	2170
2180	2180
2190	2190
2200	2200
2210	2210
2220	2220
2230	2230
2240	2240
2250	2250
2260	2260
2270	2270
2280	2280
2290	2290
2300	2300
2310	2310
2320	2320
2330	2330
2340	2340
2350	2350
2360	2360
2370	2370
2380	2380
2390	2390
2400	2400
2410	2410
2420	2420
2430	2430
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2460	2460
2470	2470
2480	2480
2490	2490
2500	2500
2510	2510
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2530	2530
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2570	2570
2580	2580
2590	2590
2600	2600
2610	2610
2620	2620
2630	2630
2640	2640
2650	2650
2660	2660
2670	2670
2680	2680
2690	2690
2700	2700
2710	2710
2720	2720
2730	2730
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2750	2750
2760	2760
2770	2770
2780	2780
2790	2790
2800	2800
2810	2810
2820	2820
2830	2830
2840	2840
2850	2850
2860	2860
2870	2870
2880	2880
2890	2890
2900	2900
2910	2910
2920	2920
2930	2930
2940	2940
2950	2950
2960	2960
2970	2970
2980	2980
2990	2990
3000	3000

Account	Balance
3000	3000
3010	3010
3020	3020
3030	3030
3040	3040
3050	3050
3060	3060
3070	3070
3080	3080
3090	3090
3100	3100
3110	3110
3120	3120
3130	3130
3140	3140
3150	3150
3160	3160
3170	3170
3180	3180
3190	3190
3200	3200
3210	3210
3220	3220
3230	3230
3240	3240
3250	3250
3260	3260
3270	3270
3280	3280
3290	3290
3300	3300
3310	3310
3320	3320
3330	3330
3340	3340
3350	3350
3360	3360
3370	3370
3380	3380
3390	3390
3400	3400
3410	3410
3420	3420
3430	3430
3440	3440
3450	3450
3460	3460
3470	3470
3480	3480
3490	3490
3500	3500
3510	3510
3520	3520
3530	3530
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3560	3560
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3580	3580
3590	3590
3600	3600
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3620	3620
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3960	3960
3970	3970
3980	3980
3990	3990
4000	4000

**Appendix C**

***Modeling Review***

**P-050037**

**Table 6: Ambient Impact Analysis for Criteria Air Pollutants - Modification Total Impact**

	Modifictn Dryer Emission Rate	Dryer Impact at 1 lb/hr Emissns	Modifictn Gen. Engine Emission Rate	Gen. Engine Impact at 1 lb/hr Emissns	Tank Heater Emission Rate	Tank Heater Impact at 1 lb/hr Emissns	Persistence Factors	Facility- Wide Modeled Conc.	Back- ground Conc.	Total Conc.	NAAQS Ambient Air Quality Standard
	lbs/hr	ug/m <sup>3</sup>	lbs/hr	ug/m <sup>3</sup>	lbs/hr	ug/m <sup>3</sup>		ug/m <sup>3</sup>	ug/m <sup>3</sup>	ug/m <sup>3</sup>	ug/m <sup>3</sup>
<b>Attainment or Unclassified Area Operations</b>											
CO	52.0	1.455	7.83	10.67	0.005	253.9	1-hr 1.0	160	3600	3760	40000
			0		0		8-hr 0.7	112	2300	2412	10000
Lead	6.00E-03		0		0		Quarterly 0.13	0.001	0.03	0.03	1.5
NO <sub>2</sub>	8.31		11.14		0.080		Annual 0.08	12	17	29	108
PM <sub>10</sub>	9.20		0.53		0.005		24-hr 0.4	8	73	81	150
	3.48		0.20		0.005		Annual 0.08	0.7	26	27	50
SO <sub>2</sub>	23.2	4.70	0.28	3-hr 0.9	140	34	174	1300			
				24-hr 0.4	62	26	88	365			
	8.76	1.77	0.28	Annual 0.08	8.3	8	16	80			

**Table 6-3 Ambient Impact Analysis for Criteria Air Pollutants - Modification Net Impact**

Pollutant	Modifictn Dryer Emission Increase (lbs/hr)	Dryer Impact at 1 lb/hr Emissions (ug/m <sup>3</sup> )	Modifictn Generator Emission Increase (lbs/hr)	Generator Impact at 1 lb/hr Emissions (ug/m <sup>3</sup> )	Averaging Period	Persistence Factors	Facility-Wide Modifictn Modeled Conc. Increase (ug/m <sup>3</sup> )	Significant Contribution Levels (ug/m <sup>3</sup> )	
<b>Attainment or Unclassifiable Area Operations</b>									
CO	37.6	1.455	0.37	10.67	1-hr	1.0	59	2000	
			0		0	8-hr	0.7	41	500
SO <sub>2</sub>	0.8		0		0	3-hr	0.9	2	25
			-0.03		24-hr	0.4	1	5	
	0.11				Annual	0.08	-0.01	1.0	
<b>Non-Attainment Area Operations</b>									
CO	37.6	1.455	0.37	10.67	1-hr	1.0	59	2000	
			0		0	8-hr	0.7	41	500
SO <sub>2</sub>	0.8		0		0	3-hr	0.9	2	25
			0		24-hr	0.4	0	5	
	0.29		0		Annual	0.08	0.06	1.0	
	0.29		0						



02/23/06

13:45:01

\*\*\* SCREEN3 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 96043 \*\*\*

Western Construction Tank Heater

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	.126000
STACK HEIGHT (M)	=	3.2320
STK INSIDE DIAM (M)	=	.2810
STK EXIT VELOCITY (M/S)	=	1.9330
STK GAS EXIT TEMP (K)	=	616.5000
AMBIENT AIR TEMP (K)	=	293.0000
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	RURAL
BUILDING HEIGHT (M)	=	.0000
MIN HORIZ BLDG DIM (M)	=	.0000
MAX HORIZ BLDG DIM (M)	=	.0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.  
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM  
VOLUME FLOW RATE = 254.00000 (ACFM)

BUOY. FLUX = .196 M\*\*4/S\*\*3; MOM. FLUX = .035 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING  
DISTANCES \*\*\*

	DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)
DASH									
	1.	.0000	1	1.0	1.0	320.0	9.55	.49	.32
NO	100.	224.5	4	2.0	2.0	640.0	6.09	8.25	4.74
NO	200.	161.0	4	1.0	1.0	320.0	9.55	15.67	8.69
NO	300.	106.6	4	1.0	1.0	320.0	9.55	22.68	12.23
NO	400.	72.88	4	1.0	1.0	320.0	9.55	29.51	15.38
NO	500.	52.67	4	1.0	1.0	320.0	9.55	36.19	18.39
NO	600.	43.69	6	1.0	1.0	10000.0	17.57	21.63	10.52
NO	700.	44.64	6	1.0	1.0	10000.0	17.57	24.80	11.67

NO	800.	43.29	6	1.0	1.0	10000.0	17.57	27.94	12.66
NO	900.	41.27	6	1.0	1.0	10000.0	17.57	31.05	13.61
NO	1000.	38.95	6	1.0	1.0	10000.0	17.57	34.13	14.54
NO	1100.	36.52	6	1.0	1.0	10000.0	17.57	37.19	15.38
NO	1200.	34.18	6	1.0	1.0	10000.0	17.57	40.22	16.18
NO	1300.	31.99	6	1.0	1.0	10000.0	17.57	43.24	16.97
NO	1400.	29.95	6	1.0	1.0	10000.0	17.57	46.23	17.74
NO	1500.	28.07	6	1.0	1.0	10000.0	17.57	49.20	18.49
NO	1600.	26.35	6	1.0	1.0	10000.0	17.57	52.16	19.22
NO	1700.	24.77	6	1.0	1.0	10000.0	17.57	55.09	19.94
NO	1800.	23.32	6	1.0	1.0	10000.0	17.57	58.01	20.64
NO	1900.	21.99	6	1.0	1.0	10000.0	17.57	60.92	21.33
NO	2000.	20.77	6	1.0	1.0	10000.0	17.57	63.81	22.01
NO	2100.	19.68	6	1.0	1.0	10000.0	17.57	66.68	22.58
NO	2200.	18.68	6	1.0	1.0	10000.0	17.57	69.54	23.15
NO	2300.	17.76	6	1.0	1.0	10000.0	17.57	72.39	23.70
NO	2400.	16.92	6	1.0	1.0	10000.0	17.57	75.23	24.24
NO	2500.	16.13	6	1.0	1.0	10000.0	17.57	78.06	24.77
NO	2600.	15.41	6	1.0	1.0	10000.0	17.57	80.87	25.29
NO	2700.	14.74	6	1.0	1.0	10000.0	17.57	83.67	25.80
NO	2800.	14.11	6	1.0	1.0	10000.0	17.57	86.46	26.30
NO	2900.	13.53	6	1.0	1.0	10000.0	17.57	89.24	26.80
NO	3000.	12.98	6	1.0	1.0	10000.0	17.57	92.01	27.29
NO	3500.	10.82	6	1.0	1.0	10000.0	17.57	105.73	29.27
NO	4000.	9.219	6	1.0	1.0	10000.0	17.57	119.24	31.11
NO	4500.	7.987	6	1.0	1.0	10000.0	17.57	132.57	32.83
NO	5000.	7.015	6	1.0	1.0	10000.0	17.57	145.73	34.45
NO	5500.	6.232	6	1.0	1.0	10000.0	17.57	158.74	35.99
NO	6000.	5.589	6	1.0	1.0	10000.0	17.57	171.63	37.46
NO	6500.	5.054	6	1.0	1.0	10000.0	17.57	184.39	38.86

NO	7000.	4.601	6	1.0	1.0	10000.0	17.57	197.04	40.21
NO	7500.	4.227	6	1.0	1.0	10000.0	17.57	209.58	41.37
NO	8000.	3.904	6	1.0	1.0	10000.0	17.57	222.02	42.48
NO	8500.	3.622	6	1.0	1.0	10000.0	17.57	234.38	43.55
NO	9000.	3.375	6	1.0	1.0	10000.0	17.57	246.64	44.59
NO	9500.	3.156	6	1.0	1.0	10000.0	17.57	258.83	45.59
NO	10000.	2.961	6	1.0	1.0	10000.0	17.57	270.93	46.56

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:  
 NO 42. 253.9 3 3.0 3.0 960.0 4.86 5.73 3.49

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 \*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	253.9	42.	0.

\*\*\*\*\*  
 \*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
 \*\*\*\*\*

07/18/05  
11:07:53

\*\*\* SCREEN3 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 96043 \*\*\*

Western Construction HMA dryer

SIMPLE TERRAIN INPUTS:

SOURCE TYPE - POINT  
EMISSION RATE (G/S) - .126000  
STACK HEIGHT (M) - 9.8900  
STK INSIDE DIAM (M) - 1.4430  
STK EXIT VELOCITY (M/S) - 25.8946  
STK GAS EXIT TEMP (K) - 380.3800  
AMBIENT AIR TEMP (K) - 293.0000  
RECEPTOR HEIGHT (M) - .0000  
URBAN/RURAL OPTION - RURAL  
BUILDING HEIGHT (M) - .0000  
MIN HORIZ BLDG DIM (M) - .0000  
MAX HORIZ BLDG DIM (M) - .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.  
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM  
VOLUME FLOW RATE = 89730.000 (ACFM)

BUOY. FLUX = 30.365 M\*\*4/S\*\*3; MOM. FLUX = 268.869 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	1	1.0	1.0	320.0	287.03	5.16	5.15	NO
100.	.3622E-01	6	1.0	1.0	10000.0	86.84	22.36	22.11	NO
200.	.4669	4	20.0	20.0	6400.0	23.15	15.75	8.84	NO
300.	1.265	4	20.0	20.0	6400.0	23.15	22.84	12.51	NO
400.	1.455	4	20.0	20.0	6400.0	23.15	29.71	15.75	NO
500.	1.371	4	20.0	20.0	6400.0	23.15	36.36	18.72	NO
600.	1.224	4	15.0	15.0	4800.0	28.37	43.04	21.86	NO
700.	1.130	4	15.0	15.0	4800.0	28.37	49.47	24.61	NO
800.	1.033	4	10.0	10.0	3200.0	37.60	56.13	27.93	NO
900.	.9859	4	10.0	10.0	3200.0	37.60	62.39	30.51	NO
1000.	.9262	4	10.0	10.0	3200.0	37.60	68.59	33.06	NO
1100.	.8611	4	10.0	10.0	3200.0	37.60	74.73	35.03	NO
1200.	.8143	4	8.0	8.0	2560.0	44.53	81.05	37.42	NO
1300.	.7707	4	8.0	8.0	2560.0	44.53	87.08	39.27	NO
1400.	.7285	4	8.0	8.0	2560.0	44.53	93.08	41.07	NO
1500.	.6884	4	8.0	8.0	2560.0	44.53	99.04	42.83	NO
1600.	.6505	4	8.0	8.0	2560.0	44.53	104.96	44.55	NO

1700.	.6151	4	8.0	8.0	2560.0	44.53	110.85	46.24	NO
1800.	.5821	4	8.0	8.0	2560.0	44.53	116.71	47.90	NO
1900.	.5627	4	5.0	5.0	1600.0	65.32	123.15	51.04	NO
2000.	.5572	5	2.0	2.0	10000.0	83.49	97.98	39.54	NO
2100.	.5716	5	2.0	2.0	10000.0	83.49	102.21	40.35	NO
2200.	.5860	5	1.5	1.5	10000.0	90.90	106.87	42.26	NO
2300.	.6009	5	1.5	1.5	10000.0	90.90	111.06	43.03	NO
2400.	.6142	5	1.5	1.5	10000.0	90.90	115.24	43.78	NO
2500.	.6262	5	1.5	1.5	10000.0	90.90	119.40	44.53	NO
2600.	.6370	5	1.0	1.0	10000.0	102.62	124.23	47.07	NO
2700.	.6512	5	1.0	1.0	10000.0	102.62	128.35	47.77	NO
2800.	.6643	5	1.0	1.0	10000.0	102.62	132.46	48.47	NO
2900.	.6763	5	1.0	1.0	10000.0	102.62	136.56	49.16	NO
3000.	.6872	5	1.0	1.0	10000.0	102.62	140.65	49.85	NO
3500.	.7282	5	1.0	1.0	10000.0	102.62	160.95	53.18	NO
4000.	.7499	5	1.0	1.0	10000.0	102.62	181.01	56.38	NO
4500.	.7482	5	1.0	1.0	10000.0	102.62	200.84	59.09	NO
5000.	.7392	5	1.0	1.0	10000.0	102.62	220.46	61.69	NO
5500.	.7256	5	1.0	1.0	10000.0	102.62	239.88	64.18	NO
6000.	.7137	6	1.0	1.0	10000.0	86.84	172.98	43.24	NO
6500.	.7214	6	1.0	1.0	10000.0	86.84	185.65	44.46	NO
7000.	.7257	6	1.0	1.0	10000.0	86.84	198.22	45.64	NO
7500.	.7222	6	1.0	1.0	10000.0	86.84	210.69	46.67	NO
8000.	.7172	6	1.0	1.0	10000.0	86.84	223.07	47.66	NO
8500.	.7109	6	1.0	1.0	10000.0	86.84	235.37	48.61	NO
9000.	.7037	6	1.0	1.0	10000.0	86.84	247.59	49.54	NO
9500.	.6958	6	1.0	1.0	10000.0	86.84	259.73	50.45	NO
10000.	.6873	6	1.0	1.0	10000.0	86.84	271.79	51.33	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:  
 402. 1.455 4 20.0 20.0 6400.0 23.15 29.91 15.85 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 \*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	1.455	402.	0.

\*\*\*\*\*  
 \*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
 \*\*\*\*\*

07/18/05  
11:16:01

\*\*\* SCREEN3 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 96043 \*\*\*

Nesten Construction generator

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
EMISSION RATE (G/S) = .126000  
STACK HEIGHT (M) = 4.5700  
STK INSIDE DIAM (M) = .2500  
STK EXIT VELOCITY (M/S) = 67.0126  
STK GAS EXIT TEMP (K) = 758.1600  
AMBIENT AIR TEMP (K) = 293.0000  
RECEPTOR HEIGHT (M) = .0000  
URBAN/RURAL OPTION = RURAL  
BUILDING HEIGHT (M) = .0000  
MIN HORIZ BLDG DIM (M) = .0000  
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.  
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM  
VOLUME FLOW RATE = 6970.0000 (ACFM)

BUOY. FLUX = 6.300 M\*\*4/S\*\*3; MOM. FLUX = 27.117 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	1	1.0	1.0	320.0	89.76	2.54	2.51	NO
100.	9.657	3	10.0	10.0	3200.0	13.09	12.59	7.66	NO
200.	9.791	4	15.0	15.0	4800.0	10.25	15.65	8.65	NO
300.	8.368	4	8.0	8.0	2560.0	15.22	22.81	12.47	NO
400.	6.755	4	5.0	5.0	1600.0	21.61	29.85	16.03	NO
500.	6.056	4	5.0	5.0	1600.0	21.61	36.47	18.93	NO
600.	5.314	4	4.5	4.5	1440.0	23.50	43.06	21.89	NO
700.	4.735	4	4.0	4.0	1280.0	25.87	49.56	24.79	NO
800.	4.284	4	3.5	3.5	1120.0	28.91	56.01	27.67	NO
900.	3.917	4	3.0	3.0	960.0	32.97	62.41	30.56	NO
1000.	3.585	4	3.0	3.0	960.0	32.97	68.61	33.10	NO
1100.	3.334	4	2.5	2.5	800.0	38.65	74.95	35.49	NO
1200.	3.104	4	2.5	2.5	800.0	38.65	81.03	37.38	NO
1300.	2.891	4	2.5	2.5	800.0	38.65	87.06	39.23	NO
1400.	2.897	5	1.0	1.0	10000.0	59.46	70.97	31.00	NO
1500.	2.967	5	1.0	1.0	10000.0	59.46	75.35	32.03	NO
1600.	3.017	5	1.0	1.0	10000.0	59.46	79.71	33.05	NO

1700.	3.089	6	1.0	1.0	10000.0	50.12	56.46	23.46	NO
1800.	3.208	6	1.0	1.0	10000.0	50.12	59.31	24.06	NO
1900.	3.313	6	1.0	1.0	10000.0	50.12	62.16	24.65	NO
2000.	3.404	6	1.0	1.0	10000.0	50.12	64.99	25.24	NO
2100.	3.452	6	1.0	1.0	10000.0	50.12	67.82	25.74	NO
2200.	3.490	6	1.0	1.0	10000.0	50.12	70.63	26.24	NO
2300.	3.519	6	1.0	1.0	10000.0	50.12	73.44	26.72	NO
2400.	3.542	6	1.0	1.0	10000.0	50.12	76.24	27.20	NO
2500.	3.557	6	1.0	1.0	10000.0	50.12	79.03	27.68	NO
2600.	3.567	6	1.0	1.0	10000.0	50.12	81.81	28.14	NO
2700.	3.571	6	1.0	1.0	10000.0	50.12	84.58	28.60	NO
2800.	3.570	6	1.0	1.0	10000.0	50.12	87.34	29.06	NO
2900.	3.565	6	1.0	1.0	10000.0	50.12	90.09	29.51	NO
3000.	3.556	6	1.0	1.0	10000.0	50.12	92.84	29.95	NO
3500.	3.416	6	1.0	1.0	10000.0	50.12	106.45	31.77	NO
4000.	3.257	6	1.0	1.0	10000.0	50.12	119.88	33.47	NO
4500.	3.094	6	1.0	1.0	10000.0	50.12	133.14	35.08	NO
5000.	2.934	6	1.0	1.0	10000.0	50.12	146.25	36.60	NO
5500.	2.780	6	1.0	1.0	10000.0	50.12	159.22	38.05	NO
6000.	2.636	6	1.0	1.0	10000.0	50.12	172.07	39.44	NO
6500.	2.500	6	1.0	1.0	10000.0	50.12	184.80	40.78	NO
7000.	2.375	6	1.0	1.0	10000.0	50.12	197.42	42.07	NO
7500.	2.255	6	1.0	1.0	10000.0	50.12	209.94	43.17	NO
8000.	2.146	6	1.0	1.0	10000.0	50.12	222.37	44.24	NO
8500.	2.045	6	1.0	1.0	10000.0	50.12	234.70	45.27	NO
9000.	1.952	6	1.0	1.0	10000.0	50.12	246.95	46.27	NO
9500.	1.866	6	1.0	1.0	10000.0	50.12	259.12	47.24	NO
10000.	1.787	6	1.0	1.0	10000.0	50.12	271.21	48.18	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:  
 135. 10.67 4 20.0 20.0 6400.0 8.83 10.96 6.18 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 \*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M*3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	10.67	135.	0.

\*\*\*\*\*  
 \*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
 \*\*\*\*\*

**Appendix D**

***Fugitive Dust Plan***

**P-050037**



**DUST SUPPRESSION PLAN  
(DSP)**

Revised 01/26/00

**Plan Prepared for Western Construction, Inc. (WCI)**

Portable Crusher #1	Permit to Construct #777-00042
Portable Crusher #3	Permit to Construct #777-00098
Portable Crusher #4	Permit to Construct #777-00231
Hot Mix Asphalt Plant	Permit to Construct #777-00212

**Background:** WCI is submitting this DSP as required by the consent order effective January 5, 2000 signed by Steve Alred, Administrator, Division of Environmental Quality (DEQ) and Richard Heaton, President, Western Construction Inc. This plan outlines the methods and procedures to the extent practicable, that WCI will implement to control fugitive dust emissions for the above permits.

**Scope of Plan:** This plan allows the superintendent the flexibility to best address dust suppression for the plant at each unique location and weather condition. It is the superintendent and foreman's responsibility to implement this plan. The areas covered by this dust suppression plan are as follows:

**Crushers**  
Crusher/Screening Units  
Transfer Points  
Stockpile and Haul Areas

**Hot Mix Plant**  
Transfer Points  
Stockpile and Haul Areas

**Implementation:** The Superintendent will visually evaluate the unique circumstances to each site as to the nature and severity of the potential dust problems. The evaluation may include all or some of the following: time of year, the material to be utilized in production, haul roads, stockpile areas, crushing units, screening units, possible weather conditions and location. This evaluation will be used to determine the plant set up.

Upon determination of proper crusher set up, spray bars and nozzles will be placed at the transfer points of crushers. A 3,000-gallon water tank will be filled as necessary to provide adequate water to the water system of spray bars and nozzles. The water system will be installed and operational before commencement of operation. In the event of a water system failure, the plant will cease to operate until the water system has been properly repaired.

Water or a chemical dust suppressant will be used to control dust on haul roads. Vehicle speed will also be evaluated as a potential to reduce dust. The water truck will water stockpiles to create a crust on the pile to control dust. The stockpile will not be watered if the stockpile is to be used within a reasonable amount of time in the hot mix asphalt plant for the production of asphalt.

The total amount of water to be used to control dust will range from 0 – 80,000 gallons per day. The exact amount of water to be used will be determined by the superintendent or foreman for each day to control dust. The superintendent or foreman will be responsible for visually evaluating the effectiveness of the dust suppression equipment. Project superintendents and/or environmental officers will periodically inspect the plants to ensure compliance.

Records will be kept daily on quantity and frequency of water or dust suppressant used. (See attached form) A maintenance checklist (attached) will be used daily to ensure proper functioning of all dust suppression equipment.

**DAILY PRODUCTION, OPERATING HOURS,  
CONTROL MEASURES, PIT DEPTH AND SETBACK**

0151

**Western Construction Inc.**

Equal Opportunity Employer

Permit to Construct Number: \_\_\_\_\_ Portable Rock Crushing Plant Number: \_\_\_\_\_

Location: \_\_\_\_\_

Attainment     Unclassified     Non-Attainment     Collocated     Not Collocated

**Record Daily**

Date	Crusher Operating Hours		Production Tons	Pit Depth Feet	Set Back Feet	Emission Control Methods Used	Quantity Used	Frequency of Use	Reason for Not Using	Generator Hours of Operation	
	Start	Stop								Start/Stop Total	Gallons Type 2 Fuel Used
S u n											
M o n											
T u e											
W e d											
T h u											
F r i											
S a t											

WCC-00000001 6/08

