Statement of Basis

Permit to Construct No. P-2020.0041
Project ID 62549

Interstate Concrete & Asphalt - 00624
Portable

Facility ID 777-00624

Final

June 11, 2021
Zach Pierce
Permit Writer

ZP

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
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
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_2	carbon dioxide
CO_2e	CO_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
fps	feet per second
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
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
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
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_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
O_2	oxygen
PAH	polyaromatic hydrocarbons
PERF	Portable Equipment Relocation Form
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers

PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

Interstate Concrete & Asphalt - 00624 has proposed a new portable drum-mix asphalt plant. The asphalt plant consists of a counter-flow asphalt drum mixer equipped with a bag house to control particulate matter, an asphaltic oil storage tank with an electric heater, 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. The applicant has also requested that recycled asphalt pavement (RAP) be used in the aggregate (up to 50% can be allowed). 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, LPG/propane, #2 diesel fuel, and used oil (RFO). Next, aggregate travels through the rotating drum mixer, and when dried and heated, it is mixed with hot liquid asphaltic oil. The asphaltic oil is heated by the asphalt tank heater to allow it to flow and be mixed with the hot, dry aggregate. 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 portable electrical generators will be used at the facility. Therefore, IC engines powering electrical generators were included in the application.

Permitting History

This is the initial PTC for a new facility thus there is no permitting history.

Application Scope

This is the initial PTC for a new facility.

The asphalt plant will be fed a mixture of crushed fines and aggregates from a collocated crusher. The rock crusher will be permitted independently from the asphalt plant. In the case of collocation of an asphalt plant with an additional rock crushing plant (secondary to the one rock crushing plant allowed by the permit), the modeling completed by DEQ requires a minimum separation distance of 1,000 ft.

The process begins with materials being fed via front end loader to a compartment bin feeder system and then dispensed in metered proportions to a collecting conveyor. The material will pass over a scalping screen before being conveyed into the drum mixer via a scalping screen.

Inside the drum mixer the aggregates will be heated to specification temperature and then asphaltic oil is added. In some instances up to 50% RAP may be substituted for virgin aggregate.

The mixed asphalt is dispensed to a slat conveyor and then lifted up to a hot storage silo for intermediate storage. Trucks are then loaded by driving under the hot storage silo.

The silo loading process will be enclosed and vented back to the drum via suction induced either through the conveyor or via a separate duct line. The unloading process will be uncontrolled.

Particulate emissions from the asphalt drum mixer will be collected and vented to a high efficiency baghouse with a minimum control efficiency of 99% as proposed by the applicant.

The asphalt plant will include a hot oil heating system designed to keep asphaltic oil at specification temperature. Heat will be provided via an electric burner.

The applicant has also proposed asphalt production rate throughput limits of 400 tons per hour, 4,000 tons per day, and 1,000,000 tons per year.

The applicant has also proposed that two compression ignition IC engines powering electrical generators, a primary and a secondary, will be used to provide electricity for the facility.

Application Chronology

December 16, 2020	DEQ received an application and an application fee.
December 21 – January 5, 2021	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 15, 2021	DEQ determined that the application was incomplete.
February 13, 2021	DEQ received supplemental information from the applicant.
March 12, 2021	DEQ determined that the application was complete.
April 27, 2021	DEQ made available the draft permit and statement of basis for peer and regional office review.
April 30, 2021	DEQ made available the draft permit and statement of basis for applicant review.
June 4, 2021	DEQ received the permit processing fee.
June 11, 2021	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 water sprays, shrouds, or other emissions controls to minimize PM_{10} emissions from aggregate handling.

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources[(a)]	Control Equipment	Emission Point ID No.
Materials Handling	Material Transfer Points: Materials handling Asphalt aggregate transfers Truck unloading of aggregate Aggregate conveyor transfers Aggregate handling	Using water sprays, using shrouds, or other emissions controls	N/A
Hot Mix Asphalt Drum Mixer	Asphalt Drum Mixer: Manufacturer: CMI Model: PTD 400 Type: Counter-flow Manufacture Date: 1996 Max. production: 400 T/hr, 4,000 T/day, and 1,000,000 T/yr Burner Mfg: CMI Burner Model No: PTD 400 Burner Rating: 88 MMBtu/hr Fuel(s): Natural gas, LPG/Propane, #2 fuel oil, or used oil (RFO) Liquid fuel sulfur content: 0.05% by weight	Asphalt Drum Mixer Baghouse: Manufacturer: Roto-Aire Model: RA-418PTD Flow rate: 28,939 dscf PM_{10} control efficiency: 99%	Exit height: 33 ft Exit diameter: 4.5 ft Exit flow rate: 53.6 fps Exit temperature: 273 °F
Primary IC Engine	Primary IC Engine: Manufacturer: Caterpillar Model: 3508TA Manufacture Date: 1999 Max. power rating: 1,161 bhp Fuel: ULSD (0.05% S by weight) Daily use limit: 12 hrs/day Annual use limit: 4,380 hrs/yr	N/A	Exit height: 13.4 ft Exit diameter: 0.21 ft Exit flow rate: 166 fps Exit temperature: 792 °F
Secondary IC Engine	Secondary IC Engine: Manufacturer: Caterpillar Model: 3306 Manufacture Date: 1996 Max. power rating: 306 bhp Fuel: ULSD 0.05% S by weight Daily use limit: 24 hrs/day Annual use limit: 4,380 hrs/yr	N/A	Exit height: 11.6 ft Exit diameter: 0.5 ft Exit flow rate: 144 fps Exit temperature: 984 °F

a) An electric asphaltic oil tank heater will be operated at the facility.

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.

Using this definition of Potential to Emit an emission inventory was developed for the asphalt production operations at the facility associated with this proposed project using the DEQ developed HMA EI spreadsheet (see Appendix A). Emissions estimates of criteria pollutant PTE were based on the following assumptions:

- Maximum asphalt throughput does not exceed 400 ton HMA/hour, 4,000 ton HMA/day, and 1,000,000 ton HMA/year (per the applicant).
- Emissions from the asphalt drum dryer were based on the maximum emissions from using any of the proposed fuels for combustion in the drum dryer.
- Emissions from a portable rock crusher were included in the emissions modeling analysis with the assumption that when the collocated rock crusher is operating, the asphalt plant is operating at half its maximum capacity.
- Any emissions unit outside a 1,000 ft radius from the asphalt plant was not included in the emissions modeling analysis for this project.
- Because the IC engines are "non-road" IC engines (thus not stationary), they were not included in the potential to emit analysis.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined 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 **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the post project uncontrolled emissions for regulated air pollutants as submitted by the applicant and verified by DEQ staff. Uncontrolled emissions were determined as follows:

- For the asphalt drum mixer uncontrolled emissions were assumed to be based upon the proposed hourly throughput times the total hours in a year (400 T/hr x 8,760 hr/yr = 3,504,000 T/yr).
- For the materials handling operation controlled and uncontrolled emissions were assumed to be equal.

The following table presents the uncontrolled Potential to Emit for criteria pollutants as calculated by the facility using the DEQ HMA EI spreadsheet. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Emissions Unit	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC	CO_2e
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Asphalt drum mixer	40.30	31.19	96.36	227.76	56.06	58,719.65
Load-out and silo filling	0.92	0.00	0.00	4.43	7.06	
Total, Point Sources	**41.22**	**31.19**	**96.36**	**232.19**	**63.12**	**58,719.7**

The following table presents the uncontrolled Potential to Emit for HAP pollutants as calculated per the DEQ HMA EI spreadsheet. See Appendix A for a detailed presentation of the calculations emissions for each emissions unit. Worst-case HAPs emissions were based upon the same assumptions as for criteria pollutants.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

IDAPA Listing	Hazardous Air Pollutants	Uncontrolled PTE (T/yr)
585	Dioxins	1.38E-07
	Furans	2.10E-07
	Acrolein	4.56E-02
	Antimony	3.15E-04
	Barium	1.02E-02
	Chromium	9.64E-03
	Cobalt	4.56E-05
	Copper	5.43E-03
	Ethyl benzene	4.20E-01
	Hexane	1.61E+00
	Manganese	1.35E-02
	Methyl chloroform	8.41E-02
	Methyl ethyl ketone (MEK)	3.50E-02
	Molybdenum	0.00E-00
	Naphthalene	1.14E+00
	Pentane	0.00E-00
	Phosphorus	4.91E-02
	Propionaldehyde	2.28E-01
	Quinone	2.80E-01
	Selenium	6.13E-04
	Silver	8.41E-04
	Thallium	7.18E-06
	Toluene	5.08E+00
	Vanadium	0.00E-00
	Xylene	3.50E-01
	Zinc	1.07E-01
586	Acetaldehyde	2.28E+00
	Arsenic	9.81E-04
	Benzene	6.83E-01
	Benzo(a)anthracene	3.68E-04
	Benzo(a)pyrene	1.72E-05
	Benzo(b)fluoranthene	1.75E-04
	Benzo(k)fluoranthene	7.18E-05
	Beryllium	0.00E-00
	1,3-Butadiene	0.00E-00
	Cadmium	7.18E-04
	Chrysene	3.15E-04
	Dibenzo(a,h)anthracene	0.00E-00
	Formaldehyde	5.43E+00
	Hexavalent Chromium	7.88E-04
	Indeno(1,2,3-cd)pyrene	1.28E-05
	3-Methylchloranthrene	0.00E-00

IDAPA Listing	Hazardous Air Pollutants	Uncontrolled PTE (T/yr)
	Nickel	1.10E-01
Not listed	Acenaphthene	2.45E-03
	Acenaphthylene	3.85E-02
	Anthracene	5.43E-03
	Benzo(e)pyrene	1.93E-04
	Benzo(g,h,l)perylene	7.01E-05
	Dichlorobenzene	0.00E+00
	Fluoranthene	1.07E-03
	Fluorene	1.93E-02
	Isooctane	7.01E-02
	Mercury	4.56E-03
	2-Methylnaphthalene	2.98E-01
	Perylene	1.54E-05
	Phenanthrene	4.03E-02
	Pyrene	5.26E-03
	Total	**18.46**

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

This is a new facility. Therefore, pre-project emissions are set to zero for all criteria pollutants.

Post Project Potential to Emit

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 4 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Emissions Unit	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC		CO_2e
	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	T/yr[(b)]
Asphalt drum mixer	9.20	11.50	7.12	8.90	22.00	27.50	52.00	65.00	12.80	16.00	16,757.89
Load-out and silo filling	0.21	0.26	0.00	0.00	0.00	0.00	1.01	1.26	1.61	2.02	
Post Project Totals	**9.41**	**11.76**	**7.12**	**8.90**	**22.00**	**27.50**	**53.01**	**66.26**	**14.41**	**18.02**	**16,757.9**

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

As demonstrated in Tables 2 and 4, this facility has uncontrolled potential to emit for PM_{10}, SO_2, NO_X, CO, and VOC, and CO_2e emissions less than the Major Source threshold of 100 T/yr and 100,000 T/yr respectively and a controlled potential to emit for PM_{10}, SO_2, NO_X, CO, and VOC, and CO_2e emissions less than the Major Source threshold of 100 T/yr and 100,000 T/yr respectively. In addition, as demonstrated in Table 3, this facility has an uncontrolled potential to emit for HAP emissions less than the Major Source threshold of 10 T/yr for any one HAP and 25 T/y for all HAPs combined. Therefore, this facility is designated as a Minor facility.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 5 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Emissions	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC		CO_2e
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	T/yr
Pre-Project Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
Post Project Potential to Emit	9.41	11.76	7.12	8.90	22.00	27.50	53.01	66.26	14.41	18.02	16,757.9
Changes in Potential to Emit	**9.41**	**11.76**	**7.12**	**8.90**	**22.00**	**27.50**	**53.01**	**66.26**	**14.41**	**18.02**	**16,757.9**

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE emissions increase of non-carcinogenic toxic air pollutants (TAPs) is provided in the following table.

Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Acetone	0.00E-03	1.40E-01	**0.1400**	**119**	**No**
Acrolein	0.00E-03	4.33E-03	**0.0043**	**0.017**	**No**
Antimony	0.00E-03	3.00E-05	**0.0000**	**0.033**	**No**
Barium	0.00E-03	9.67E-04	**0.0010**	**2**	**No**
Carbon disulfide	0.00E-03	4.15E-04	**0.0009**	**0.033**	**No**
Chromium metal (II and III)	0.00E-03	9.17E-04	**0.0009**	**0.033**	**No**
Cobalt metal dust, and fume	0.00E-03	4.33E-06	**0.0000**	**0.0033**	**No**
Copper (fume)	0.00E-03	5.17E-04	**0.0005**	**0.013**	**No**
Crotonaldehyde	0.00E-03	1.43E-02	**0.0143**	**0.38**	**No**
Cumene	0.00E-03	7.62E-04	**0.0008**	**16.3**	**No**
Ethyl benzene	0.00E-03	4.27E-02	**0.0427**	**29**	**No**
Ethyl chloride (Chloroethane)	0.00E-03	8.27E-05	**0.0001**	**176**	**No**
Heptane	0.00E-03	1.57E+00	**1.5700**	**109**	**No**
Hexane	0.00E-03	1.56E-01	**0.1560**	**12**	**No**
Manganese as Mn (fume)	0.00E-03	1.28E-03	**0.0013**	**0.067**	**No**
Mercury (alkyl compounds as Hg)	0.00E-03	4.33E-04	**0.0004**	**0.001**	**No**
Methyl bromide	0.00E-03	1.66E-04	**0.0002**	**1.27**	**No**
Methyl chloride (Chloromethane)	0.00E-03	5.71E-04	**0.0006**	**6.867**	**No**
Methyl chloroform	0.00E-03	8.00E-03	**0.0080**	**127**	**No**
Methyl ethyl ketone (MEK)	0.00E-03	4.47E-03	**0.0045**	**39.3**	**No**
Molybdenum (soluble)	0.00E-03	0.00E-03	**0.0000**	**0.333**	**No**
Pentane	0.00E-03	0.00E-00	**0.0350**	**118**	**No**
Phenol	0.00E-03	6.71E-04	**0.0007**	**1.27**	**No**
Phosphorous	0.00E-03	4.67E-03	**0.0047**	**0.007**	**No**
Propionaldehyde	0.00E-03	2.17E-02	**0.0217**	**0.0287**	**No**
Quinone	0.00E-03	2.67E-02	**0.0267**	**0.027**	**No**
Selenium	0.00E-03	5.83E-05	**0.0001**	**0.013**	**No**
Silver as Ag (soluble)	0.00E-03	8.00E-05	**0.0001**	**0.001**	**No**
Styrene monomer	0.00E-03	1.60E-04	**0.0002**	**6.67**	**No**
Thallium	0.00E-03	6.83E-07	**0.0000**	**0.007**	**No**
Toluene	0.00E-03	4.86E-01	**0.4860**	**25**	**No**
Trichloroethylene	0.00E-03	0.00E-03	**0.0000**	**17.93**	**No**
Vanadium as V_2O_5, (respirable dust and fume)	0.00E-03	0.00E-03	**0.0000**	**0.003**	**No**
Xylene	0.00E-03	4.69E-02	**0.0469**	**29**	**No**
Zinc metal	0.00E-03	1.02E-02	**0.0102**	**0.667**	**No**

None of the PTEs for non-carcinogenic TAPs were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic TAPs is provided in the following table.

Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Acetaldehyde	0.00E-03	1.97E-01	**0.1970**	**3.0E-03**	**Yes**
Arsenic	0.00E-03	8.48E-05	**0.000085**	**1.5E-06**	**Yes**
Benzene	0.00E-03	6.00E-02	**0.0600**	**8.0E-04**	**Yes**
Beryllium and compounds	0.00E-03	0.00E-03	**0.0000000**	**2.8E-05**	**No**
Cadmium and compounds	0.00E-03	6.21E-05	**0.0000682**	**3.7E-06**	**Yes**
Chromium (VI)	0.00E-03	6.82E-05	**0.000068**	**5.6E-07**	**Yes**
Dichloromethane	0.00E-03	5.48E-06	**0.000005**	**1.6E-03**	**No**
Formaldehyde	0.00E-03	4.83E-01	**0.4830**	**5.1E-04**	**Yes**
Nickel	0.00E-03	9.55E-03	**0.0096**	**2.7E-05**	**Yes**
PAHs Total	0.00E-03	1.41E-01	**0.1410**	**9.1E-05**	**Yes**
POM[a] Total	0.00E-03	2.55E-04	**0.000255**	**2.0E-06**	**Yes**
Tetrachloroethylene	0.00E-03	5.34E-05	**0.0001**	**1.3E-02**	**No**

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

Some of the PTEs for carcinogenic TAPs were exceeded as a result of this project. Therefore, modeling is required for Acetaldehyde, Arsenic, Benzene, Cadmium, Chromium (VI), Formaldehyde, Nickel, PAHs, and POM because the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for hazardous air pollutants (HAPs) pollutants from all emissions units at the facility as submitted by the applicant and verified by DEQ staff. See Appendix X for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 8 POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS EMISSIONS

IDAPA Listing	Hazardous Air Pollutants	PTE (T/yr)
585	Dioxins	3.95E-08
	Furans	6.00E-08
	Acrolein	1.30E-02
	Antimony	9.00E-05
	Barium	2.90E-03
	Chromium	2.75E-03
	Cobalt	1.30E-05
	Copper	1.55E-03
	Ethyl benzene	1.20E-01
	Hexane	4.60E-01
	Manganese	3.85E-03
	Methyl chloroform	2.40E-02
	Methyl ethyl ketone (MEK)	1.00E-02
	Molybdenum	0.00E-00
	Naphthalene	3.25E-01
	Pentane	0.00E-00
	Phosphorus	1.40E-02
	Propionaldehyde	6.50E-02
	Quinone	8.00E-02
	Selenium	1.75E-04
	Silver	2.40E-04
	Thallium	2.05E-06
	Toluene	1.45E+00
	Vanadium	0.00E-00
	Xylene	1.00E-01
	Zinc	3.05E-02

IDAPA Listing	Hazardous Air Pollutants	PTE (T/yr)
586	Acetaldehyde	6.50E-01
	Arsenic	2.80E-04
	Benzene	1.95E-01
	Benzo(a)anthracene	1.05E-04
	Benzo(a)pyrene	4.90E-06
	Benzo(b)fluoranthene	5.00E-05
	Benzo(k)fluoranthene	2.05E-05
	Beryllium	0.00E-00
	1,3-Butadiene	0.00E-00
	Cadmium	2.05E-04
	Chrysene	9.00E-05
	Dibenzo(a,h)anthracene	0.00E-00
	Formaldehyde	1.55E+00
	Hexavalent Chromium	2.25E-04
	Indeno(1,2,3-cd)pyrene	3.50E-06
	3-Methylchloranthrene	0.00E-00
	Nickel	3.15E-02
Not listed	Acenaphthene	7.00E-04
	Acenaphthylene	1.10E-02
	Anthracene	1.55E-03
	Benzo(e)pyrene	5.50E-05
	Benzo(g,h,l)perylene	2.00E-05
	Dichlorobenzene	0.00E+00
	Fluoranthene	3.05E-04
	Fluorene	5.50E-03
	Isooctane	2.00E-02
	Mercury	1.30E-03
	2-Methylnaphthalene	8.50E-02
	Perylene	4.40E-06
	Phenanthrene	1.15E-02
	Pyrene	1.50E-03
	Total	**5.27**

The estimated PTE for all federally listed HAPs combined is below 25 T/yr and no PTE for a federally listed HAP exceeds 10 T/yr. Therefore, this facility is not a Major Source for HAPs.

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Appendix B, the estimated emission rates of PM_{10}, $PM_{2.5}$, SO_2, NO_X, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline[1]. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

The applicant has demonstrated pre-construction 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 applicant has also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP). A summary of the Ambient Air Impact Analysis for TAP is provided in Appendix B.

An ambient air quality impact analysis document has been crafted by DEQ based on a review of the modeling analysis submitted in the application. That document is part of the final permit package for this permitting action (see Appendix B).

[1] Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

As a result of the ambient air quality impact analysis, as well as information submitted by the applicant for specific operating scenarios, the following conditions (along with corresponding monitoring and record keeping requirements) were placed in the permit:

- The Emissions Limits permit condition,
- The Asphalt Production Limits permit condition,
- The Reduced Asphalt Production Limits permit condition,
- The Allowable Raw Materials permit condition,
- The Asphalt Operation Setback Distance Requirements permit condition,
- The Seasonal Operation permit condition, and
- The Simultaneous Operation Requirement permit condition, and
- The Relocation Requirement permit condition.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

This modeling analysis for this facility demonstrates compliance with applicable standards in attainment areas. However, because a separate modeling analysis was not provided to demonstrate compliance with applicable standards in non-attainment areas, this portable facility is not permitted for operation in non-attainment areas. This requirement is assured by Permit Condition 2.6.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.

SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.

SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the

100 T/yr major source threshold.

UNK = Class is unknown.

Table 9 Regulated Air Pollutant Facility Classification

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	41.22	11.76	**100**	B
PM_{10}	41.22	11.76	**100**	B
$PM_{2.5}$	41.22	11.76	**100**	B
SO_2	31.19	8.90	**100**	B
NO_X	96.36	27.50	**100**	B
CO	232.19	66.26	**100**	SM
VOC	63.12	18.02	**100**	B
HAP (single)	5.43	1.55	**10**	B
Total HAPs	18.46	5.27	**25**	B

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 new emissions sources. 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 Conditions 3.5 and 4.3.

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 2.1, 2.2, and 2.8.

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 new asphalt drum mixer emissions unit proposed to be installed as a result of this project with a proposed throughput of 400 T/hr, E is calculated as follows:

- Proposed throughput = 400 T/hr x 2,000 lb/1 T = 800,000 lb/hr

Therefore, E is calculated as:

- $E = 1.10 \times PW^{0.25} = 1.10 \times (800{,}000)^{0.25} = 32.89$ lb-PM/hr

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 9.41 lb-PM_{10}/$PM_{2.5}$ per hour. Assuming PM is 50% PM_{10}/$PM_{2.5}$ means that PM emissions will be 18.82 lb-PM/hr (9.41 lb- PM_{10}/$PM_{2.5}$ per hour ÷ 0.5 lb-PM_{10}/$PM_{2.5}$ per lb-PM). This is less than the calculated Rule requirement PM emissions rate of 32.89 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 2.7 and 2.11.

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 2.1 and 2.2.

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

IDAPA 58.01.01.301……Requirement to Obtain Tier I Operating Permit

IDAPA 58.01.01.006 defines a Tier I source as "Any source located at a major facility as defined in Section 008." IDAPA 58.01.01.008.10 defines a Major Facility as either:

- For HAP a facility with the potential to emit ten (10) tons per year (T/yr) or more of any hazardous air pollutant, other than radionuclides, or
- The facility emits or has the potential to emit twenty-five (25) T/yr or more of any combination of any hazardous air pollutants, other than radionuclides.

or, for non-attainment areas (Note: The State of Idaho currently has no serious non-attainment areas therefore the Major Source threshold is defined as follows):

- The facility emits or has the potential to emit one hundred (100) tons per year or more of any regulated air pollutant. The fugitive emissions shall not be considered in determining whether the facility is major unless the facility is a "Designated Facility":

Therefore, it needs to be determined if this facility is a HAP Major Source. The following table compares this facility's post-project facility-wide annual PTE for all HAP emitted by the source to the HAP Major Source thresholds in order to determine if this facility is a HAP Major Source.

Table 10 PTE FOR THE HAZARDOUS AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

Hazardous Air Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
Dioxins	3.95E-08	10	No
Furans	6.00E-08	10	No
Acrolein	1.30E-02	10	No
Antimony	9.00E-05	10	No
Barium	2.90E-03	10	No
Chromium	2.75E-03	10	No
Cobalt	1.30E-05	10	No
Copper	1.55E-03	10	No
Ethyl benzene	1.20E-01	10	No
Hexane	4.60E-01	10	No
Manganese	3.85E-03	10	No
Methyl chloroform	2.40E-02	10	No
Methyl ethyl ketone (MEK)	1.00E-02	10	No
Molybdenum	0.00E-00	10	No
Naphthalene	3.25E-01	10	No
Pentane	0.00E-00	10	No
Phosphorus	1.40E-02	10	No
Propionaldehyde	6.50E-02	10	No
Quinone	8.00E-02	10	No
Selenium	1.75E-04	10	No
Silver	2.40E-04	10	No
Thallium	2.05E-06	10	No
Toluene	1.45E+00	10	No
Vanadium	0.00E-00	10	No
Xylene	1.00E-01	10	No
Zinc	3.05E-02	10	No
Acetaldehyde	6.50E-01	10	No
Arsenic	2.80E-04	10	No
Benzene	1.95E-01	10	No
Benzo(a)anthracene	1.05E-04	10	No
Benzo(a)pyrene	4.90E-06	10	No
Benzo(b)fluoranthene	5.00E-05	10	No
Benzo(k)fluoranthene	2.05E-05	10	No
Beryllium	0.00E-00	10	No
1,3-Butadiene	0.00E-00	10	No
Cadmium	2.05E-04	10	No
Chrysene	9.00E-05	10	No
Dibenzo(a,h)anthracene	0.00E-00	10	No

Hazardous Air Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
Formaldehyde	1.55E+00	10	No
Hexavalent Chromium	2.25E-04	10	No
Indeno(1,2,3-cd)pyrene	3.50E-06	10	No
3-Methylchloranthrene	0.00E-00	10	No
Nickel	3.15E-02	10	No
Acenaphthene	7.00E-04	10	No
Acenaphthylene	1.10E-02	10	No
Anthracene	1.55E-03	10	No
Benzo(e)pyrene	5.50E-05	10	No
Benzo(g,h,l)perylene	2.00E-05	10	No
Dichlorobenzene	0.00E+00	10	No
Fluoranthene	3.05E-04	10	No
Fluorene	5.50E-03	10	No
Isooctane	2.00E-02	10	No
Mercury	1.30E-03	10	No
2-Methylnaphthalene	8.50E-02	10	No
Perylene	4.40E-06	10	No
Phenanthrene	1.15E-02	10	No
Pyrene	1.50E-03	10	No
Total	**5.27**	**25**	**No**

As presented in the preceding table the PTE for each HAP is less than 10 T/yr and the PTE for all HAP combined is less than 25 T/yr. Therefore, this facility is not a HAP Major Source subject to Tier I requirements.

Therefore, it needs to be determined if this facility is a criteria pollutant Major Source. The following table compares the post-project facility-wide annual PTE for all criteria pollutants emitted by the source to the applicable criteria pollutant Major Source thresholds in order to determine if the facility is a criteria pollutant Major Source.

Table 11 PTE FOR REGULATED AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

Regulated Air Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
$PM_{10}/PM_{2.5}$	11.76	100	No
SO_2	8.90	100	No
NO_X	27.50	100	No
CO	66.26	100	No
VOC	18.02	100	No
CO_2e	16,757.9	100,000	No

As presented in the preceding table the PTE for each criteria pollutant is less than 100 T/yr. Therefore, this facility is not a criteria pollutant Major Source subject to Tier I requirements.

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.

Non-road Engine (40 CFR 1068)

40 CFR 1068…… General Compliance Provisions for Highway, Stationary, and Nonroad Programs

40 CFR 1068.30 defines a non-road engine as an internal combustion engine that is by itself or in or on a piece of equipment, it is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

An IC engine is not a non-road engine if it will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. For any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced, include the time period of both engines in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (*i.e.,* at least two years) and that operates at that single location approximately three months (or more) each year. See §1068.31 for provisions that apply if the engine is removed from the location.

For this project the facility has proposed compression ignition IC engines that meet the definition of non-road engines. Note: If the IC engines remain at a site for more than12 months, the facility shall submit an application for a PTC modification to permit the engines as stationary source IC engines. Therefore, NSPS Subpart IIII and MACT Subpart ZZZZ do not apply to the IC engines involved with this project.

This requirement is assured by Permit Condition 2.5.

NSPS Applicability (40 CFR 60)

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

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

DEQ has been delegated authority to this subpart.

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 3.4 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. Permit Conditions 3.14 and 3.15 includes the requirements of this section. Per the information submitted by the applicant (see Record Number 2021AAG685), the initial Subpart I source test has been performed on this asphalt plant. Therefore, no initial Subpart I source test is required of this asphalt plant.

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, 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 2.1 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 2.2 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 2.3 establishes that the asphalt plant may collocate with one rock crushing plant and shall not locate with 1,000 ft. of another rock crushing plant, any other asphalt plant, or a concrete batch plant as requested by the applicant.

Permit Condition 2.4 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 2.5 establishes that the permittee shall relocate the HMA equipment to a new pit or storage area once every 12 months. This requirement was requested by the applicant because this is how the plant will normally be operated and because it allowed the set-back distances, required through the Ambient Air Quality Analysis, to be less than what would be required if more than one year of operation at a site was requested.

Permit Condition 2.6 establishes a restriction on locating the portable asphalt plant to non-attainment areas. The location restrictions are based upon parameters used during the ambient air quality modeling analysis performed for this project.

Permit Condition 2.7 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 2.8 establishes that the permittee shall monitor fugitive dust emissions on a daily basis to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 2.9 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 2.10 establishes that the permittee record the date and location of the HMA plant each time it is relocated to demonstrate compliance with the Relocation Restriction permit condition.

Permit Condition 2.11 establishes that the permittee monitor and record odor complaints to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 2.12 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

Asphalt Production Equipment

Permit Condition 3.1 provides a process description of the asphalt production process at this facility.

Permit Condition 3.2 provides a description of the control devices used on the asphalt production equipment at this facility.

Permit Condition 3.3 establishes hourly and annual emissions limits for $PM_{2.5}$, SO_2, NO_X, CO, and VOC emissions from the asphalt production operation at this facility.

As discussed previously Permit Condition 3.4 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 3.5 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 3.6 establishes an hourly, a daily, and an annual asphalt production limit for the asphalt production operation as proposed by the applicant.

Permit Condition 3.7 establishes a daily asphalt production limit for the asphalt production operation when operated on days when a collocated portable rock crusher is operated. This requirement was based upon the air quality modeling analysis performed for this application.

Permit Condition 3.8 establishes limits for the raw materials that can be used in the asphalt production operation as proposed by the applicant.

Permit Condition 3.9 establishes setback distance restrictions for the asphalt production operation. The setback distance restrictions are based upon the results of the Ambient Air Quality Modeling Analysis performed for this project.

Permit Condition 3.10 establishes that a baghouse be used to control emissions from the asphalt drum mixer as proposed by the applicant.

Permit Condition 3.11 establishes that the HMA plant will not be operated December 1st through February 28nd of the following year. This requirement was requested by the applicant because this is how the plant will normally be operated and because it allowed the set-back distances, required through the Ambient Air Quality Analysis, to be less than what would be required if year-round operation was requested.

Permit Condition 3.12 establishes fuel use restrictions for combustion in the asphalt drum mixer based upon 40 CFR 279.11. These fuel use restrictions were based on the fuels proposed by the applicant to be combusted in the asphalt drum mixer.

Permit Condition 3.13 establishes $PM_{2.5}$ and opacity performance testing requirements required by DEQ on asphalt plants located in the state of Idaho. The source test report provided to DEQ stated the test occurred on October 1, 2018; therefore, the facility is required to submit their next test in the 5 years after that date, by October 1, 2023.

Permit Condition 3.14 establishes $PM_{2.5}$ and opacity performance testing methods and procedures required by DEQ on asphalt plants located in the state of Idaho.

Permit Condition 3.15 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 3.16 establishes that the Permittee monitor and record hourly and daily asphalt production to demonstrate compliance with the Asphalt Production Limits permit condition.

Permit Condition 3.17 establishes that the Permittee calculate and record RAP use to demonstrate compliance with the Allowable Raw Materials permit condition.

Permit Condition 3.18 establishes that the Permittee measure and record asphalt production equipment setback distances to demonstrate compliance with operating permit requirements.

Permit Condition 3.19 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 3.20 establishes that the permittee monitor distillate fuel oil shipments to demonstrate compliance with operating permit requirements.

Permit Condition 3.21 establishes that the permittee monitor used oil fuel shipments to demonstrate compliance with the used oil fuel requirements of the permit.

Permit Condition 3.22 establishes that the permittee shall record daily operation of the HMA plant to demonstrate compliance with the Seasonal Operation permit requirement.

Permit Condition 3.23 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

Permit Condition 3.24 establishes that the permittee shall submit the results of the performance tests to the appropriate DEQ office.

Permit Condition 3.25 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.

Permit Condition 3.26 incorporates 40 CFR 60, Subpart A – General Provisions.

Internal Combustion Engines

Permit Condition 4.1 provides a process description of the IC engines process at this facility.

Permit Condition 4.2 provides a description of the control devices used on the IC engines at this facility.

As discussed previously, Permit Condition 4.3 establishes a 20% opacity limit for the Primary IC Engine and the Secondary IC Engine exhaust stacks or functionally equivalent openings associated with the asphalt production operation.

Permit Condition 4.4 establishes a daily and an annual operation limit for the Primary IC Engine as proposed by the applicant. This condition as well as Permit Condition 4.5 and 4.6 were included due to the assumptions applied in the Ambient Air Quality Analysis, even though the engines aren't included in the potential to emit analysis.

Permit Condition 4.5 establishes a daily and an annual operation limit for the Secondary IC Engine as proposed by the applicant.

Permit Condition 4.6 establishes that both IC engines not be operated simultaneously. This requirement was requested by the applicant because this is how the IC engines will normally be operated and because it is required through the Ambient Air Quality Analysis.

Permit Condition 4.7 establishes fuel use restrictions for combustion in the Primary IC Engine and the Secondary IC Engine. These fuel use restrictions were based on the fuel proposed by the applicant to be combusted in the Primary IC Engine and the Secondary IC Engine.

Permit Condition 4.8 establishes that the permittee monitor and record daily operation of the Primary IC Engine to demonstrate compliance with the Primary IC Engine Operating Limits permit condition.

Permit Condition 4.9 establishes that the permittee monitor and record daily operation of the Secondary IC Engine to demonstrate compliance with the Secondary IC Engine Operating Limits permit condition.

Permit Condition 4.10 establishes that the daily operating requirements demonstrate that both IC engines are not operated simultaneously demonstrate compliance with the IC Engines Simultaneous Operation Requirement permit condition.

Permit Condition 4.11 establishes that the permittee monitor distillate fuel oil shipments to demonstrate compliance with the distillate fuel oil requirements of the permit.

Permit Condition 4.12 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

Hot Mix Asphalt EI Spreadsheet

Idaho Department of Environmental Quality, Air Quality Division, Boise, Idaho **Version 8/2/18**

Information shown in bold blue on any worksheet indicates user input for that cell. Black or blue text (normal or bold) is calculated or hard-wired -- do not type over formulas in these cells.

These worksheets were developed to expedite processing of PTC permits for Hot Mix Asphalt (HMA) facilities that are collocated with only one rock crushing plant and no other sources of emissions within 1,000 feet.

User Input:

Facility Data Input worksheet: Input facility-specific data including contact information, equipment ratings, proposed HMA production levels, and tank heater and generator hours of operation. Select fuel types and generator options as noted below.

Short term source factor for carcinogens is set to "N", i.e., No. Do not change this to Y. Do not delete cells related to this as this will zero out carcinogenic emissions.

Using T-RACT for carcinogens is set to "N", i.e., No. Do not change this to Y. If appropriate, apply T-RACT factor of 10 to the carcinogenic ambient impact results from the modeling analysis.

Asphalt Drum Mixer/Dryer with Fabric Filter (Baghouse), either counterflow or parallel flow, fired by the following fuels:

For distallate fuel oil the default is 0.5% sulfur content by weight. User input is required in "Facility Data Input" for any other sulfur content.
For used Oil/RFO4 the default is 0.5% sulfur content by weight. User input required in "Facility Data Input" for any other sulfur content.
Natural gas
LPG/propane
Note: For Facility Data Input., input "1" (use this fuel) or "0" (don't use this fuel).
Note: The EI summary sheets will use the highest emission for any selected fuel for each pollutant.

Asphaltic Oil Tank Heater, either fired by #2 fuel oil or natural gas

Note: For Facility Data Input., input "1" (use this fuel) or "0" (don't use this fuel).
Note: If line power is **ALWAYS** used to power the Asphaltic oil tank heater, input "0" for each fuel.
For distallate fuel oil the default is 0.5% sulfur content by weight. User input is required in "Facility Data Input" for any other sulfur content.
Note: The EI summary sheets will use the highest emission for any selected fuel for each pollutant.

For IC Engines Powering Electrical Generators (with a maximum of one small, less than 600 bhp, and/or one large IC engine, greater than 600 bhp)

Facility Data Input: Input "1" (include IC engine) or "0" (omit IC engine). If the engine is a "non-road" IC engine (thus not stationary), "0" should be selected for fuel.
For distallate fuel oil the default is 0.5% sulfur content by weight. User input is required in "Facility Data Input" for any other sulfur content.
Engine Certification: Input whether or not the IC engine is certified, or is certfied to meet EPA Tier 1, Tier 2, Tier 3, Tier 4 or Blue Sky standards.
The EI will use the appropriate EFs for either a large or small diesel-fueled generator. EI summary sheets combine contributions from just one small (< 600 bhp) and/or one large (> 600 bhp) generator.

General Assumptions (see the next tab sheet for specific assumptions for each tab sheet):

This emissions evaluation is based on IDAPA regulatory requirements current as of spreadsheet version date.
EFs are drawn from AP-42 factors available as of spreadsheet version date.
Average brake-specific fuel consumption of 7,000 Btu/hp-hr was assumed to convert from lb/MMBtu to lb/hp-hr.
Average diesel heating value is based on 19,300 Btu/lb with a density of 7.1 lb/gal.
AP-42 EFs for natural gas combustion (Tables 1.4-xx) are based on heat value of 1,020 Btu/scf.
Natural Gas Fuel Heating Value assumed to be 137,030 Btu/gal.
"Reasonable" AP-42 factors are used. Where factors were available in more than one AP-42 section, the estimates are based on the highest of the available factors. For example, AP-42 11.1 EFs for a tank heater burning #2 oil include no information for emissions of PM, NOx, SOx, VOCs, or lead, which is not reasonable. Criteria pollutant EFs from AP-42 1.3, Fuel Oil Combustion, are used instead, and are considered reasonable.
Fugitive Emissions: Fugitive PM emissions from storage piles are typically caused by front-end loader operations that transport the aggregate to the cold feed unit hoppers. Piles of RAP, because RAP is coated with asphalt cement, are not likely to cause significant fugitive dust problems. Aggregate moisture content prior to entry into the dryer is typically 3 percent to 7 percent. This moisture content, along with aggregate size classification, tend to minimize emissions from these sources, which contribute little to total facility PM emissions. PM10 emissions from these sources are reported to account for about 19 percent of their total PM emissions. *Source: STAPPA-ALAPCO-EPA, Preferred and Alternative Methods for Estimating Air Emissions from Hot-Mix Asphalt Plants, Final Report, July 1996. DEQ* CONCLUSION: Negligible fine PM emissions from RAP. Worst-case fugitive emissions from material handling are for 0% RAP. Assume aggregate/RAP tons = 96% of total HMA tons.

Worksheet Tabs: Letter-Number reflect Location and Order in Statement of Basis

Facility Data Input (primary worksheet for user **input** of facility-specific parameters)
EmissionInventory lb/hr - Drum dryer baghouse, tank heater, generator, silo filling, and load-out
EmissionInventory TPY - Drum dryer baghouse, tank heater, generator, silo filling, and load-out
Values in Emission Inventories reflect the maximum emissions ONLY from fuel types selected.
FACWIDE TAPs ELs. Used for TAPs EL screening. Includes silo/loadout fugitives.
Lb/hr emissions shown are 24-hr averages for noncarcinogens and annual averages for carcinogens.
Modeling - Criteria Pollutants 1-, 3-, 8-, 24-hour, and annual lb/hr emission rates
Modeling - TAPs 24-hour and annual lb/hr emission rates

Worksheets for Emissions based on Source and Fuel Type:

Drum Dryer Used Oil FabricFilter	Drum Dryer, fired on used oil or RF04 oil
Drum Dryer #2 Oil FabricFilter	Drum Dryer, fired on #2 fuel oil
Drum Dryer NG Fabric Filter	Drum Dryer, natural gas fired
Drum Dryer LPG or Propane FabricFilter	Drum Dryer, LPG or propane-fired
Tank Heater #2 Oil AP-42 1.3, 11.1	Asphalt Tank Heater, fired on #2 fuel oil
Tank Heater NG-AP42 11.1	Asphalt Tank Heater, natural gas fired
Tank Heater NG-AP42 1.4	Asphalt Tank Heater, natural gas fired
Silo Fill Operations	Fugitive emissions based on HMA throughput
Load-out Operations	Fugitive emissions based on HMA throughput

Scalping Screen & Transfer Points (Front-end Loader and Conveyors) - **Input # transfer pts, wind speeds & moisture**
IC1 Emission Factors (Selects appropriate EFs for non-certified engines and EPA Tier 1, 2, 3, and Blue Sky engines)
IC ENGINE 1< 600 bhp (< 447kW) #2 Fuel oil fired
IC2 Emission Factors (Selects appropriate EFs for non-certified engines and EPA Tier 1, 2, 3, and Blue Sky engines)
IC ENGINE 2 > 600 bhp (> 447kW) #2 Fuel oil fired

DEQ ASSUMPTIONS

DEQ assumptions for the "Drum Dryer UsedOil FabricFilter" Calculations
1. Drum Dryer may be either counter-flow or parallel flow (AP-42 specifies no diference in emissions from either type).
2. SO2 emissions are based on the sulfur content and the Scavenging Factor (varies from 50 to 97%). DEQ used a scavenging factor of 63%. The sulfur content of the three waste oil source tests averaged 0.44 % by weight.

DEQ assumptions for the "Drum Dryer NG FabricFilter" Calculations

DEQ assumptions for the "Drum Dryer #2 Oil FabricFilter" Calculations
1. SO2 emissions are based on the sulfur content and the Scavenging Factor (varies from 50 to 97%). DEQ used a scavenging factor of 63%. The sulfur content of the three waste oil source tests averaged 0.44 % by weight.

DEQ assumptions for the "Drum Dryer LPGProp FabricFilter" Calculations

DEQ assumptions for the "TankHtr #2 Oil-AP42 1.3,11.1" Calculations
1. VOC and TAPs emissions from the asphaltic oil storage tank were determined using Tanks 4.0.9d and the Working and Breathing losses were negligible (less than 1% of total VOC emissions).

DEQ assumptions for the "Tank Heater NG-AP42 11.1" Calculations
1. VOC and TAPs emissions from the asphaltic oil storage tank were determined using Tanks 4.0.9d and the Working and Breathing losses were negligible (less than 1% of total VOC emissions).

DEQ assumptions for the "Tank Heater NG-AP42 1.4" Calculations
1. VOC and TAPs emissions from the asphaltic oil storage tank were determined using Tanks 4.0.9d and the Working and Breathing losses were negligible (less than 1% of total VOC emissions).

DEQ assumptions for the "SiloFill Criteria&TAPs" Calculations
1. All PM10 is assumed to be PM2.5.

DEQ assumptions for the "Loadout Criteria&TAPs" Calculations
1. All PM10 is assumed to be PM2.5.

DEQ assumptions for the "IC ENGINE 1<600 bhp (447 kW)" Calculations
1. All PM10 is assumed to be PM2.5.
Note that TAPS from IC engines are not included the screening analysis or modeling analysis because the TAPs are regulated by a NESHAP/NSPS. Emission estimates are provided but they do not bubble up to the comparison to the EL and are not included in the modeling emission inventory.

DEQ assumptions for the "IC ENGINE 2>600 bhp (447 kW)" Calculations
1. All PM10 is assumed to be PM2.5.
Note that TAPS from IC engines are not included the screening analysis or modeling analysis because the TAPs are regulated by a NESHAP/NSPS. Emission estimates are provided but they do not bubble up to the comparison to the EL and are not included in the modeling emission inventory.

DEQ assumptions for the "Scalping Scrn & Transfer Points" Calculations
1. Except for the Aggregate Scalping Screen emissions calculations, all other fugitive emissions (Aggregate Loader Drop Points, Aggregate Weigh Conveyor, and the Aggregate Conveyor to Drum)are calculated using AP-42, Section13.2.4 (11/06) which is based upon the average wind speed for the location of the operation.
2. 90% control assumed for FE based on fugitive emission controls in permit.

CURRENT PTC APPLICATION VALUES

DEQ Verification Worksheets: Hot Mix Asphalt (HMA) Drum Mix Facility Data			
Facility ID/AIRS No.		Spreadsheet Date	6/7/2021 9:28
Permit No.		DEQ Version Date	8/2/2018
Facility Owner/Company Name:	**Interstate Concrete & Asphalt - 00617**		
Address:	**(portable) P.O. Box 3366**		
City, State, Zip:	**Spokane, WA 99220**		
Facility Contact:	**Jana McDonald**		
Contact Number/ e-mail:	**(509)534-6221 / jana.mcdonald@na.crh.com**		
		Include Silo Fill & Loadout Emissions?	**Y**
Use Short Term Source Factor on 586 ELs? Y/N	**Y**	**Use T-RACT on 586 AACC? Y/N**	**N**
Hot Mix Plant AP-42 Section 11.1	**Input (Bold Color) or Calculated Value (Black)**	**Fuel Type(s)**	**Fuel Type Toggle ("0" or "1")**
Drum Dryer Make/Model	**CMI/ PTD 400**	Distallate (#2) Fuel Oil	**1**
Rated heat input capacity, MMBtu/hr	**88**	Used Oil or RFO4 Oil	**1**
Drum Dryer Hourly HMA Production, Tons/hour	**400**	Natural Gas	**1**
Max Production Per day, Tons per day	**4,000**	LPG or Propane	**1**
Max Annual HMA Production, Tons/year	**1,000,000**	Default #2 fuel oil and used oil sulfur content percentage by weight	0.0015% and 0.5%
Min Hours of operation per year (annual/max hourly production)	2,500	#2 Fuel Oil Max Sulfur Content	**0.0500%**
		Used Oil/RFO4 Oil Max Sulfur Content	**0.1000%**
Asphaltic Oil Tank Heater AP-42, Section 11.1 (oil or natural gas fuel), or Section 1.4 (natural gas fuel)			**ELECTRIC**
Rated heat input capacity, MMBtu/hr	**10.000**	**Fuel Type(s)**	**Fuel Toggle**
Hours of operation per day	**24**	#2 Fuel Oil	**0**
Operation, days per year (DEQ Assumption)	166.67	Fuel oil sulfur content	**0.500%**
Max Hours of operation per year (DEQ Assumption)	4,000	Natural Gas	**0**

Asphaltic Oil Tank Heater Fuel Consumption Calculations	#2 Fuel Oil	Natural Gas
Heat Input Rating, MMBtu/hr	10.000	10.000
Fuel Heating Value, Btu/gal (oil) or Btu/scf (gas)	137,030	**1,020**
Heating Value Correction for Natural Gas EFs, see Note	n/a	1.000
Theoretical Max Fuel Use Rate gal/hr [oil] or scf/hr [gas]	72.98	9,804
Max Operational Hours per Year	4,000	4,000
Note: AP-42 EFs for natural gas and diesel combustion are based on heat value of 1,020 Btu/scf and 137,030 Btu/gal		

IC Engine EI Conversion Factors			
1 hp = 0.7456999 kW	0.7457	1 lb = (g)	453.59
Avg brake-specific fuel consumption (BSFC) = 7000 Btu/hp-hr	7000	Fuel Heating Value, Btu/gal	137,030
Note: AP-42 Tables 3.3-x,3.4-x: avg. diesel heating value is based on 19,300 Btu/lb with density equal 7.1 lb/gal=> Btu/gal =			137,030

NOTE: THE HMA EI SUMMARY WORKSHEETS ONLY ALLOWS ONE SMALL AND/OR ONE LARGE IC ENGINE.

IC Engine 1 < 600 bhp (447 kW) AP-42 Section 3.3 (diesel fueled)			
IC Engine Make/Model	**Caterpillar/ 3306**	**Fuel Type(s)**	**IC Engine Toggle**
IC Engine Year Manufactured (yyyy)	**1996**	#2 Fuel Oil (Diesel)	**0**
IC Engine Max Rated Power (bhp)	**306**	Max Sulfur weight percentage	**0.0500%**
IC Engine Max Rated Capacity (kW)	228	Max Operational Hours/Day	**12**
		Max Operational Hours/Year	**4,380**
IC Engine 1 EPA Certification:	**0**	Calculated Max Fuel Use Rate, gal/hr	15.63
Not EPA-certified: Enter "0" (zero)		Calculated MMBtu/hr	2.14

Certified Tier I, Tier 2, Tier 3, or Tier 4: Enter 1, 2, 3, or 4	
Certified "BLUE SKY" engine: Enter 5	

IC Engine 2 > 600 bhp (447 kW) AP-42 Section 3.4 (diesel fueled)			
IC Engine Make/Model	**Caterpillar/ 3508TA**	**Fuel Type(s)**	**IC Engine Toggle**
IC Engine Year Manufactured (yyyy)	**1999**	#2 Fuel Oil (Diesel)	**0**
IC Engine Rated Capacity (bhp)	**1,161**	Max Sulfur weight percentage	**0.0500%**
IC Engine Max Rated Capacity (kW)	866	Max Operational Hours per Day	**12**
		Max Operational Hours per Year	**4,380**
IC Engine 2 EPA Certification:	**0**	Calculated Max Fuel Use Rate, gal/hr	59.31
Not EPA-certified: Enter "0" (zero)		Calculated MMBtu/hr	8.13
Certified Tier I, Tier 2, Tier 3, or Tier 4: Enter 1, 2, 3, or 4			
Certified "BLUE SKY" engine: Enter 5			

Aggregate Handling - Fugitive Emissions		
U = mean wind speed (miles per hour)	**10**	
Moisture/Control % Considerations:		
AP-42 Table 11.19.2-2, Note b. Moisture content of uncontrolled sources ranged from 0.21 to 1.3%		
AP-42 Table 11.19.2-2, Note b. Moisture content of controlled (water spray) sources ranged from 0.55 to 2.88% -->		
		--> ~91.3% control for screening, ~95% control for conveyo
M = moisture content (%)	**3**	Bulk aggregate for HMAstypically stabilizes at 3 to 5% by weight.
If higher moisture is maintained, apply additional % control:	**90.00%**	For M=3% add 10% control. For M=5% add 15% control. 90% cont
Number of front-end loader drop points (aggregate and RAP) (DEQ Assumption)	**2**	Drops to storage pile(s) and drop(s) to bins
Aggregate weigh conveyor transfer points (DEQ Assumption)	**2**	Transfer from bins to conveyor & from conveyor to scalping screen
Number of scalping screens (DEQ Assumption)	1	Includes all aggregate and RAP tonnage.
Aggregate conveyor transfer to drum (DEQ Assumption)	1	Includes all aggregate and RAP tonnage.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

Used Oil Fired Drum Mix Asphalt Plant With Fabric Filter AP-42 Section 11.1

Fuel Type Toggle = 1
Max Hourly Production 400 T/hr
Max Daily Production 4,000 Tons/day
Max Annual Production 1,000,000 Tons/yr

User Input Weight % Sulfur = 0.1000%
AP-42 EF of 0.058 lb SO2/ton presumed based on #2 oil, max 0.5% sulfur content
SO2 emissions are multiplied by a factor: User Input Value/0.5% = 0.20

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total) [b]	0.033	13.20	16.50	
PM-10 (total) [b]	0.023	9.20	11.50	
PM-2.5 [b1]	0.0223	8.92	11.15	
CO [c]	0.13	52.00	65.00	
NOx [c]	0.055	22.00	27.50	
SO_2 [c]	0.089	7.12	8.90	
VOC [d]	0.032	12.80	16.00	
Lead	1.50E-05	6.00E-03	7.50E-03	
HCl [d,e]	0.00021	0.084	1.05E-01	
Dioxins[e,f]				
2,3,7,8-TCDD	2.10E-13	8.40E-11	1.05E-10	**3.18E-11**
Total TCDD	9.30E-13	3.72E-10	4.65E-10	**1.41E-10**
1,2,3,7,8-PeCDD	3.10E-13	1.24E-10	1.55E-10	**4.70E-11**
Total PeCDD	2.20E-11	8.80E-09	1.10E-08	**3.33E-09**
1,2,3,4,7,8-HxCDD	4.20E-13	1.68E-10	2.10E-10	**6.36E-11**
1,2,3,6,7,8-HxCDD	1.30E-12	5.20E-10	6.50E-10	**1.97E-10**
1,2,3,7,8,9-HxCDD	9.80E-13	3.92E-10	4.90E-10	**1.48E-10**
Total HxCDD	1.20E-11	4.80E-09	6.00E-09	**1.82E-09**
1,2,3,4,6,7,8-Hp-CDD	4.80E-12	1.92E-09	2.40E-09	**7.27E-10**
Total HpCDD	1.90E-11	7.60E-09	9.50E-09	**2.88E-09**
Octa CDD	2.50E-11	1.00E-08	1.25E-08	**3.79E-09**
Total PCDD[h]	7.90E-11	3.16E-08	3.95E-08	**1.20E-08**
Furans[e,f]				
2,3,7,8-TCDF	9.70E-13	3.88E-10	4.85E-10	**1.47E-10**
Total TCDF	3.70E-12	1.48E-09	1.85E-09	**5.61E-10**
1,2,3,7,8-PeCDF	4.30E-12	1.72E-09	2.15E-09	**6.52E-10**
2,3,4,7,8-PeCDF	8.40E-13	3.36E-10	4.20E-10	**1.27E-10**
Total PeCDF	8.40E-11	3.36E-08	4.20E-08	**1.27E-08**
1,2,3,4,7,8-HxCDF	4.00E-12	1.60E-09	2.00E-09	**6.06E-10**
1,2,3,6,7,8-HxCDF	1.20E-12	4.80E-10	6.00E-10	**1.82E-10**
2,3,4,6,7,8-HxCDF	1.90E-12	7.60E-10	9.50E-10	**2.88E-10**
1,2,3,7,8,9-HxCDF	8.40E-12	3.36E-09	4.20E-09	**1.27E-09**
Total HxCDF	1.30E-11	5.20E-09	6.50E-09	**1.97E-09**
1,2,3,4,6,7,8-HpCDF	6.50E-12	2.60E-09	3.25E-09	**9.85E-10**
1,2,3,4,7,8,9-HpCDF	2.70E-12	1.08E-09	1.35E-09	**4.09E-10**
Total HpCDF	1.00E-11	4.00E-09	5.00E-09	**1.52E-09**
Octa CDF	4.80E-12	1.92E-09	2.40E-09	**7.27E-10**
Total PCDF[h]	4.00E-11	1.60E-08	2.00E-08	**6.06E-09**
Total PCDD/PCDF[h]	1.20E-10	4.80E-08	6.00E-08	**1.82E-08**
Non-PAH HAPs[f]				
Acetaldehyde[e]	1.30E-03	5.20E-01	6.50E-01	**1.97E-01**
Acrolein[e]	2.60E-05	1.04E-02	1.30E-02	4.33E-03
Benzene[e]	3.90E-04	1.56E-01	1.95E-01	**5.91E-02**
1,3-Butadiene[e]				
Ethylbenzene[e]	2.40E-04	9.60E-02	1.20E-01	4.00E-02
Formaldehyde[e]	3.10E-03	1.24E+00	1.55E+00	**4.70E-01**
Hexane[e]	9.20E-04	3.68E-01	4.60E-01	1.53E-01
Isooctane	4.00E-05	1.60E-02	2.00E-02	6.67E-03
Methyl Ethyl Ketone[e]	2.00E-05	8.00E-03	1.00E-02	3.33E-03
Pentane[e]				
Propionaldehyde[e]	1.30E-04	5.20E-02	6.50E-02	2.17E-02
Quinone[e]	1.60E-04	6.40E-02	8.00E-02	2.67E-02
Methyl chloroform[e]	4.80E-05	1.92E-02	2.40E-02	8.00E-03
Toluene[e]	2.90E-03	1.16E+00	1.45E+00	4.83E-01
Xylene[e]	2.00E-04	8.00E-02	1.00E-01	3.33E-02
POM (7-PAH Group)		2.19E-04		**8.30E-05**

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	1.70E-04	6.80E-02	8.50E-02	**2.58E-02**
3-Methylchloranthrene[e]				
Acenaphthene	1.40E-06	5.60E-04	7.00E-04	**2.12E-04**
Acenaphthylene	2.20E-05	8.80E-03	1.10E-02	**3.33E-03**
Anthracene	3.10E-06	1.24E-03	1.55E-03	**4.70E-04**
Benzo(a)anthracene	2.10E-07	8.40E-05	1.05E-04	**3.18E-05**
Benzo(a)pyrene[e]	9.80E-09	3.92E-06	4.90E-06	**1.48E-06**
Benzo(b)fluoranthene	1.00E-07	4.00E-05	5.00E-05	**1.52E-05**
Benzo(e)pyrene	1.10E-07	4.40E-05	5.50E-05	**1.67E-05**
Benzo(g,h,i)perylene	4.00E-08	1.60E-05	2.00E-05	**6.06E-06**
Benzo(k)fluoranthene	4.10E-08	1.64E-05	2.05E-05	**6.21E-06**
Chrysene	1.80E-07	7.20E-05	9.00E-05	**2.73E-05**
Dibenzo(a,h)anthracene				
Dichlorobenzene				
Fluoranthene	6.10E-07	2.44E-04	3.05E-04	**9.24E-05**
Fluorene	1.10E-05	4.40E-03	5.50E-03	**1.67E-03**
Indeno(1,2,3-cd)pyrene	7.00E-09	2.80E-06	3.50E-06	**1.06E-06**
Naphthalene[e]	6.50E-04	2.60E-01	3.25E-01	**9.85E-02**
Perylene	8.80E-09	3.52E-06	4.40E-06	**1.33E-06**
Phenanthrene	2.30E-05	9.20E-03	1.15E-02	**3.48E-03**
Pyrene	3.00E-06	1.20E-03	1.50E-03	**4.55E-04**
Non-HAP Organic Compounds[f]				
Acetone[e]	8.30E-04	3.32E-01	4.15E-01	1.38E-01
Benzaldehyde	1.10E-04	4.40E-02	5.50E-02	1.83E-02
Butane	6.70E-04	2.68E-01	3.35E-01	1.12E-01
Butyraldehyde	1.60E-04	6.40E-02	8.00E-02	2.67E-02
Crotonaldehyde[e]	8.60E-05	3.44E-02	4.30E-02	1.43E-02
Ethylene	7.00E-03	2.80E+00	3.50E+00	1.17E+00
Heptane	9.40E-03	3.76E+00	4.70E+00	1.57E+00
Hexanal	1.10E-04	4.40E-02	5.50E-02	1.83E-02
Isovaleraldehyde	3.20E-05	1.28E-02	1.60E-02	5.33E-03
2-Methyl-1-pentene	4.00E-03	1.60E+00	2.00E+00	6.67E-01
2-Methyl-2-butene	5.80E-04	2.32E-01	2.90E-01	9.67E-02
3-Methylpentane	1.90E-04	7.60E-02	9.50E-02	3.17E-02
1-Pentene	2.20E-03	8.80E-01	1.10E+00	3.67E-01
n-Pentane	2.10E-04	8.40E-02	1.05E-01	3.50E-02
Valeraldehyde[e]	6.70E-05	2.68E-02	3.35E-02	1.12E-02
Metals[g]				
Antimony[e]	1.80E-07	7.20E-05	9.00E-05	3.00E-05
Arsenic[e]	5.60E-07	2.24E-04	2.80E-04	**8.48E-05**
Barium[e]	5.80E-06	2.32E-03	2.90E-03	9.67E-04
Beryllium[e]				
Cadmium[e]	4.10E-07	1.64E-04	2.05E-04	**6.21E-05**
Chromium[e]	5.50E-06	2.20E-03	2.75E-03	9.17E-04
Cobalt[e]	2.60E-08	1.04E-05	1.30E-05	4.33E-06
Copper[e]	3.10E-06	1.24E-03	1.55E-03	5.17E-04
Hexavalent Chromium[e]	4.50E-07	1.80E-04	2.25E-04	**6.82E-05**
Manganese[e]	7.70E-06	3.08E-03	3.85E-03	1.28E-03
Mercury[e]	2.60E-06	1.04E-03	1.30E-03	4.33E-04
Molybdenum[e]				
Nickel[e]	6.30E-05	2.52E-02	3.15E-02	**9.55E-03**
Phosphorus[e]	2.80E-05	1.12E-02	1.40E-02	4.67E-03
Silver[e]	4.80E-07	1.92E-04	2.40E-04	8.00E-05
Selenium[e]	3.50E-07	1.40E-04	1.75E-04	5.83E-05
Thallium[e]	4.10E-09	1.64E-06	2.05E-06	6.83E-07
Vanadium[e]				
Zinc[e]	6.10E-05	2.44E-02	3.05E-02	1.02E-02

a) Emission factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04
b) AP-42, Table 11.1-3, Particulate Matter Emission Factors for Drum Mix Hot Asphalt Plants, 3/04
b1) AP-42, Table 11.1-4, Summary of Particle Size Distribution for Drum Mix Dryers **(Emission Rating Factor E - "Poor")**
c) AP-42, Table 11.1-7, Emission Factors for CO. CO2, NOx, and SO2 from Drum Mix Hot Asphalt Plants, 3/04
In addition, for SO2 emissions the AP-42 EF of 0.058 lb/ton was adjusted twice. First, to account for the average sulfur content of the fuel used during the source test (0.44% by weight, three tests on waste oil), 0.058 to 0.066. Second, to account for the average scavenging factor of 63% down to 50%, 0.062 to 0.089.
d) AP-42, Table 11.1-8, Emission Factors for TOC, Methane, VOC, and HCl from Drum Mix Hot Asphalt Plants, 3/04
e) IDAPA Toxic Air Pollutant
f) AP-42, Table 11.1-10, Emission Factors for Organic Pollutant Emissions from Drum Mix Hot Asphalt Plants, 3/04
g) AP-42, Table 11.1-12, Emission Factors for Metal Emissions from Drum Mix Hot Mix Asphalt Plants, 3/04
h) Compound is classified as polycyclic organic matter, as defined in the 1990 CAAA. Total PCDD is the sum of the total tetra through octa dioxins; total PCDF is sum of the total tetra through octa furans; and total PCDD/PCDF is the sum of total PCDD and total PCDF.

Pollutants shown in bold/blue text are emitted when using Used Oil but not when using #2 Fuel Oil or Natural Gas.
Pollutants shown in magenta are emitted when using Used Oil or #2 Fuel Oil, but not when using Natural Gas

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Pollutants shown in blue text are emitted only when burning Used Oil, but not when burning #2 Fuel Oil or Natural Gas

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/ Facility ID:** **0** **0**

Natural Gas Fired Drum Mix Asphalt Plant With Fabric Filter AP-42 Section 11.1

Fuel Type Toggle = 1
Max Hourly Production 400 Tons/hr
Max Daily Production 4,000 Tons/day
Max Annual Production 1,000,000 Tons/yr (Proposed Throughput Limit)

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)[b]	0.033	13.20	16.50	
PM-10 (total)[b]	0.023	9.20	11.50	
PM-2.5 [b1]	0.0223	8.92	11.15	
CO [c]	0.13	52.00	65.00	
NOx [c]	0.026	10.40	13.00	
SO_2 [c]	0.0034	1.36	1.70	
VOC [d]	0.032	12.80	16.00	
Lead	6.20E-07	2.48E-04	3.10E-04	
HCl [d,e]	No Data			
Dioxins[e]				
-- No EFs for Natural Gas Fuel --				
Furans[e]				
-- No EFs for Natural Gas Fuel --				
Non-PAH HAPs[f]				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]	3.90E-04	1.56E-01	1.95E-01	**5.91E-02**
1,3-Butadiene[e]				
Ethylbenzene[e]	2.40E-04	9.60E-02	1.20E-01	4.00E-02
Formaldehyde[e]	3.10E-03	1.24E+00	1.55E+00	**4.70E-01**
Hexane[e]	9.20E-04	3.68E-01	4.60E-01	1.53E-01
Isooctane	4.00E-05	1.60E-02	2.00E-02	6.67E-03
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]	4.80E-05	1.92E-02	2.40E-02	8.00E-03
Toluene[e]	1.50E-04	6.00E-02	7.50E-02	2.50E-02
Xylene[e]	2.00E-04	8.00E-02	1.00E-01	3.33E-02
POM (7-PAH Group)		4.54E-02		**1.72E-02**

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPS Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	7.40E-05	2.96E-02	3.70E-02	**1.12E-02**
3-Methylchloranthrene[e]				
Acenaphthene	1.40E-06	5.60E-04	7.00E-04	**2.12E-04**
Acenaphthylene	8.60E-06	3.44E-03	4.30E-03	**1.30E-03**
Anthracene	2.20E-07	8.80E-05	1.10E-04	**3.33E-05**
Benzo(a)anthracene	2.10E-07	8.40E-05	1.05E-04	**3.18E-05**
Benzo(a)pyrene[e]	9.80E-09	3.92E-06	4.90E-06	**1.48E-06**
Benzo(b)fluoranthene	1.00E-07	4.00E-05	5.00E-05	**1.52E-05**
Benzo(e)pyrene	1.10E-07	4.40E-05	5.50E-05	**1.67E-05**
Benzo(g,h,I)perylene	4.00E-08	1.60E-05	2.00E-05	**6.06E-06**
Benzo(k)fluoranthene	4.10E-08	1.64E-05	2.05E-05	**6.21E-06**
Chrysene	1.80E-07	7.20E-05	9.00E-05	**2.73E-05**
Dibenzo(a,h)anthracene				
Dichlorobenzene				
Fluoranthene	6.10E-07	2.44E-04	3.05E-04	**9.24E-05**
Fluorene	3.80E-06	1.52E-03	1.90E-03	**5.76E-04**
Indeno(1,2,3-cd)pyrene	7.00E-09	2.80E-06	3.50E-06	**1.06E-06**
Naphthalene[e]	9.00E-05	3.60E-02	4.50E-02	**1.36E-02**
Perylene	8.80E-09	3.52E-06	4.40E-06	**1.33E-06**
Phenanthrene	7.60E-06	3.04E-03	3.80E-03	**1.15E-03**
Pyrene	5.40E-07	2.16E-04	2.70E-04	**8.18E-05**
Non-HAPs Organic Compounds[f]				
Acetone[e]				
Benzaldehyde				
Butane	6.70E-04	2.68E-01	3.35E-01	1.12E-01
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene	7.00E-03	2.80E+00	3.50E+00	1.17E+00
Heptane	9.40E-03	3.76E+00	4.70E+00	1.57E+00
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene	4.00E-03	1.60E+00	2.00E+00	6.67E-01
2-Methyl-2-butene	5.80E-04	2.32E-01	2.90E-01	9.67E-02
3-Methylpentane	1.90E-04	7.60E-02	9.50E-02	3.17E-02
1-Pentene	2.20E-03	8.80E-01	1.10E+00	3.67E-01
n-Pentane	2.10E-04	8.40E-02	1.05E-01	3.50E-02
Valeraldehyde				
Metals[g]				
Antimony[e]	1.80E-07	7.20E-05	9.00E-05	3.00E-05
Arsenic[e]	5.60E-07	2.24E-04	2.80E-04	**8.48E-05**
Barium[e]	5.80E-06	2.32E-03	2.90E-03	9.67E-04
Beryllium[e]				
Cadmium[e]	4.10E-07	1.64E-04	2.05E-04	**6.21E-05**
Chromium[e]	5.50E-06	2.20E-03	2.75E-03	9.17E-04
Cobalt[e]	2.60E-08	1.04E-05	1.30E-05	4.33E-06
Copper[e]	3.10E-06	1.24E-03	1.55E-03	5.17E-04
Hexavalent Chromium[e]	4.50E-07	1.80E-04	2.25E-04	**6.82E-05**
Manganese[e]	7.70E-06	3.08E-03	3.85E-03	1.28E-03
Mercury[e]	2.40E-07	9.60E-05	1.20E-04	4.00E-05
Molybdenum[e]				
Nickel[e]	6.30E-05	2.52E-02	3.15E-02	**9.55E-03**
Phosphorus[e]	2.80E-05	1.12E-02	1.40E-02	4.67E-03
Silver[e]	4.80E-07	1.92E-04	2.40E-04	8.00E-05
Selenium[e]	3.50E-07	1.40E-04	1.75E-04	5.83E-05
Thallium[e]	4.10E-09	1.64E-06	2.05E-06	6.83E-07
Vanadium[e]				
Zinc[e]	6.10E-05	2.44E-02	3.05E-02	1.02E-02

a) Emission factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04
b) AP-42, Table 11.1-3, Particulate Matter Emission Factors for Drum Mix Hot Asphalt Plants, 3/04
b1) AP-42, Table 11.1-4, Summary of Particle Size Distribution for Drum Mix Dryers **(Emission Rating Factor E - "Poor")**
c) AP-42, Table 11.1-7, Emission Factors for CO. CO2, NOx, and SO2 from Drum Mix Hot Asphalt Plants, 3/04
d) AP-42, Table 11.1-8, Emission Factors for TOC, Methane, VOC, and HCl from Drum Mix Hot Asphalt Plants, 3/04
e) IDAPA Toxic Air Pollutant
f) AP-42, Table 11.1-10, Emission Factors for Organic Pollutant Emissions from Drum Mix Hot Asphalt Plants, 3/04
g) AP-42, Table 11.1-12, Emission Factors for Metal Emissions from Drum Mix Hot Mix Asphalt Plants, 3/04

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

#2 Fuel Oil Fired Drum Mix Asphalt Plant With Fabric Filter AP-42 Section 11.1

Fuel Type Toggle = 1
Hourly Production 400 T/hr
Daily Production 4,000 Tons/day
Max Annual Production 1,000,000 Tons/yr

User Input Weight % Sulfur = 0.0500%
AP-42 EF of 0.058 lb SO2/ton presumed based on #2 oil, max 0.5% sulfur content
SO2 emissions are multiplied by a factor: User Input Value/0.5% = 0.100

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr) Maximum	Emissions (T/yr)	TAPs Emissions (lb/hr) Annual or 24-hr Average
PM (total) [b]	0.033	13.20	16.50	
PM-10 (total) [b]	0.023	9.20	11.50	
PM-2.5 [b1]	0.0223	8.92	11.15	
CO [c]	0.13	52.00	65.00	
NOx [c]	0.055	22.00	27.50	
SO_2 [c]	0.089	3.56	4.45	
VOC [d]	0.032	12.80	16.00	
Lead	1.50E-05	6.00E-03	7.50E-03	
HCl [d,e]	No Data			
Dioxins[e]				
2,3,7,8-TCDD	2.10E-13	8.4E-11	1.05E-10	**3.18E-11**
Total TCDD	9.30E-13	3.72E-10	4.65E-10	**1.41E-10**
1,2,3,7,8-PeCDD	3.10E-13	1.24E-10	1.55E-10	**4.70E-11**
Total PeCDD	2.20E-11	8.8E-09	1.10E-08	**3.33E-09**
1,2,3,4,7,8-HxCDD	4.20E-13	1.68E-10	2.10E-10	**6.36E-11**
1,2,3,6,7,8-HxCDD	1.30E-12	5.2E-10	6.50E-10	**1.97E-10**
1,2,3,7,8,9-HxCDD	9.80E-13	3.92E-10	4.90E-10	**1.48E-10**
Total HxCDD	1.20E-11	4.8E-09	6.00E-09	**1.82E-09**
1,2,3,4,6,7,8-Hp-CDD	4.80E-12	1.92E-09	2.40E-09	**7.27E-10**
Total HpCDD	1.90E-11	7.6E-09	9.50E-09	**2.88E-09**
Octa CDD	2.50E-11	1E-08	1.25E-08	**3.79E-09**
Total PCDD[h]	7.90E-11	3.16E-08	3.95E-08	**1.20E-08**
Furans[e]				
2,3,7,8-TCDF	9.70E-13	3.88E-10	4.85E-10	**1.47E-10**
Total TCDF	3.70E-12	1.48E-09	1.85E-09	**5.61E-10**
1,2,3,7,8-PeCDF	4.30E-12	1.72E-09	2.15E-09	**6.52E-10**
2,3,4,7,8-PeCDF	8.40E-13	3.36E-10	4.20E-10	**1.27E-10**
Total PeCDF	8.40E-11	3.36E-08	4.20E-08	**1.27E-08**
1,2,3,4,7,8-HxCDF	4.00E-12	1.6E-09	2.00E-09	**6.06E-10**
1,2,3,6,7,8-HxCDF	1.20E-12	4.8E-10	6.00E-10	**1.82E-10**
2,3,4,6,7,8-HxCDF	1.90E-12	7.6E-10	9.50E-10	**2.88E-10**
1,2,3,7,8,9-HxCDF	8.40E-12	3.36E-09	4.20E-09	**1.27E-09**
Total HxCDF	1.30E-11	5.2E-09	6.50E-09	**1.97E-09**
1,2,3,4,6,7,8-HpCDF	6.50E-12	2.6E-09	3.25E-09	**9.85E-10**
1,2,3,4,7,8,9-HpCDF	2.70E-12	1.08E-09	1.35E-09	**4.09E-10**
Total HpCDF	1.00E-11	4E-09	5.00E-09	**1.52E-09**
Octa CDF	4.80E-12	1.92E-09	2.40E-09	**7.27E-10**
Total PCDF[h]	4.00E-11	1.6E-08	2.00E-08	**6.06E-09**
Total PCDD/PCDF[h]	1.20E-10	4.8E-08	6.00E-08	**1.82E-08**
Non-PAH HAPs[f]				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]	3.90E-04	1.56E-01	1.95E-01	**5.91E-02**
1,3-Butadiene[e]				
Ethylbenzene[e]	2.40E-04	9.60E-02	1.20E-01	4.00E-02
Formaldehyde[e]	3.10E-03	1.24E+00	1.55E+00	**4.70E-01**
Hexane[e]	9.20E-04	3.68E-01	4.60E-01	1.53E-01
Isooctane	4.00E-05	1.60E-02	2.00E-02	6.67E-03
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]	4.80E-05	1.92E-02	2.40E-02	8.00E-03
Toluene[e]	2.90E-03	1.16E+00	1.45E+00	4.83E-01
Xylene[e]	2.00E-04	8.00E-02	1.00E-01	3.33E-02
POM (7-PAH Group)		2.19E-04		**8.30E-05**

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr) Maximum	Emissions (T/yr)	TAPs Emissions (lb/hr) Annual or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	0.00017	6.80E-02	8.50E-02	**2.58E-02**
3-Methylchloranthrene[e]				
Acenaphthene	1.40E-06	5.60E-04	7.00E-04	**2.12E-04**
Acenaphthylene	2.20E-05	8.80E-03	1.10E-02	**3.33E-03**
Anthracene	3.10E-06	1.24E-03	1.55E-03	**4.70E-04**
Benzo(a)anthracene	2.10E-07	8.40E-05	1.05E-04	**3.18E-05**
Benzo(a)pyrene[e]	9.80E-09	3.92E-06	4.90E-06	**1.48E-06**
Benzo(b)fluoranthene	1.00E-07	4.00E-05	5.00E-05	**1.52E-05**
Benzo(e)pyrene	1.10E-07	4.40E-05	5.50E-05	**1.67E-05**
Benzo(g,h,I)perylene	4.00E-08	1.60E-05	2.00E-05	**6.06E-06**
Benzo(k)fluoranthene	4.10E-08	1.64E-05	2.05E-05	**6.21E-06**
Chrysene	1.80E-07	7.20E-05	9.00E-05	**2.73E-05**
Dibenzo(a,h)anthracene				
Dichlorobenzene				
Fluoranthene	6.10E-07	2.44E-04	3.05E-04	**9.24E-05**
Fluorene	1.10E-05	4.40E-03	5.50E-03	**1.67E-03**
Indeno(1,2,3-cd)pyrene	7.00E-09	2.80E-06	3.50E-06	**1.06E-06**
Naphthalene[e]	0.00065	2.60E-01	3.25E-01	**9.85E-02**
Perylene	8.80E-09	3.52E-06	4.40E-06	**1.33E-06**
Phenanthrene	2.30E-05	9.20E-03	1.15E-02	**3.48E-03**
Pyrene	3.00E-06	1.20E-03	1.50E-03	**4.55E-04**
Non-HAP Organic Compounds[f]				
Acetone[e]				
Benzaldehyde				
Butane	6.70E-04	2.68E-01	3.35E-01	1.12E-01
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene	7.00E-03	2.80E+00	3.50E+00	1.17E+00
Heptane	9.40E-03	3.76E+00	4.70E+00	1.57E+00
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene	4.00E-03	1.60E+00	2.00E+00	6.67E-01
2-Methyl-2-butene	5.80E-04	2.32E-01	2.90E-01	9.67E-02
3-Methylpentane	1.90E-04	7.60E-02	9.50E-02	3.17E-02
1-Pentene	2.20E-03	8.80E-01	1.10E+00	3.67E-01
n-Pentane	2.10E-04	8.40E-02	1.05E-01	3.50E-02
Valeraldehyde				
Metals[g]				
Antimony[e]	1.80E-07	7.20E-05	9.00E-05	3.00E-05
Arsenic[e]	5.60E-07	2.24E-04	2.80E-04	**8.48E-05**
Barium[e]	5.80E-06	2.32E-03	2.90E-03	9.67E-04
Beryllium[e]				
Cadmium[e]	4.10E-07	1.64E-04	2.05E-04	**6.21E-05**
Chromium[e]	5.50E-06	2.20E-03	2.75E-03	9.17E-04
Cobalt[e]	2.60E-08	1.04E-05	1.30E-05	4.33E-06
Copper[e]	3.10E-06	1.24E-03	1.55E-03	5.17E-04
Hexavalent Chromium[e]	4.50E-07	1.80E-04	2.25E-04	**6.82E-05**
Manganese[e]	7.70E-06	3.08E-03	3.85E-03	1.28E-03
Mercury[e]	2.60E-06	1.04E-03	1.30E-03	4.33E-04
Molybdenum[e]				
Nickel[e]	6.30E-05	2.52E-02	3.15E-02	**9.55E-03**
Phosphorus[e]	2.80E-05	1.12E-02	1.40E-02	4.67E-03
Silver[e]	4.80E-07	1.92E-04	2.40E-04	8.00E-05
Selenium[e]	3.50E-07	1.40E-04	1.75E-04	5.83E-05
Thallium[e]	4.10E-09	1.64E-06	2.05E-06	6.83E-07
Vanadium[e]				
Zinc[e]	6.10E-05	2.44E-02	3.05E-02	1.02E-02

a) Emission factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04
b) AP-42, Table 11.1-3, Particulate Matter Emission Factors for Drum Mix Hot Asphalt Plants, 3/04
b1) AP-42, Table 11.1-4, Summary of Particle Size Distribution for Drum Mix Dryers **(Emission Rating Factor E - "Poor")**
c) AP-42, Table 11.1-7, Emission Factors for CO. CO2, NOx, and SO2 from Drum Mix Hot Asphalt Plants, 3/04
In addition, for SO2 emissions the AP-42 EF of 0.058 lb/ton was adjusted twice. First, to account for the average sulfur content of the fuel used during the source test (0.44% by weight, three tests on waste oil), 0.058 to 0.066. Second, to account for the average scavenging factor of 63% down to 50%, 0.062 to 0.089.
d) AP-42, Table 11.1-8, Emission Factors for TOC, Methane, VOC, and HCl from Drum Mix Hot Asphalt Plants, 3/04
e) IDAPA Toxic Air Pollutant
f) AP-42, Table 11.1-10, Emission Factors for Organic Pollutant Emissions from Drum Mix Hot Asphalt Plants, 3/04
g) AP-42, Table 11.1-12, Emission Factors for Metal Emissions from Drum Mix Hot Mix Asphalt Plants, 3/04
h) Compound is classified as polycyclic organic matter, as defined in the 1990 CAAA. Total PCDD is the sum of the total tetra through octa dioxins; total PCDF is sum of the total tetra through octa furans; and total PCDD/PCDF is the sum of total PCDD and total PCDF.

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/ Facility ID:** **0** **0**

LPG or Propane Fired Drum Mix Asphalt Plant With Fabric Filter

Fuel Type Toggle = 1
Max Hourly Production 400 Tons/hr
Max Daily Production 4,000 Tons/day
Max Annual Production 1,000,000 Tons/yr

Note: Presumes same emissions as natural gas except for NOx
(see AP-42, Section 1.5, Liquefied Petroleum Gas Combustion)
SO2 emissions from natural gas are ~70% lower than with #2 Fuel Oil, and ~94% lower than with Used Oil or #6 Fuel Oil (minimal impact on emissions, used Nat Gas EF)

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)[b]	0.033	13.20	16.50	
PM-10 (total)[b]	0.023	9.20	11.50	
PM-2.5 [b1]	0.0223	8.92	11.15	
CO [c]	0.13	52.00	65.00	
NOx [c1] (Natural Gas EF x 1.5)	0.039	15.60	19.50	
SO_2 [c]	0.0034	1.36	1.70	
VOC [d]	0.032	12.80	16.00	
Lead	6.20E-07	0.000248	3.10E-04	
HCl [d,e]	No Data			
Dioxins[e]				
-- No EFs for LP Gas or Propane Fuel --				
Furans[e]				
-- No EFs for LP Gas or Propane Fuel --				
Non-PAH HAPs[f]				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]	3.90E-04	1.56E-01	1.95E-01	**5.91E-02**
1,3-Butadiene[e]				
Ethylbenzene[e]	2.40E-04	9.60E-02	1.20E-01	4.00E-02
Formaldehyde[e]	3.10E-03	1.24E+00	1.55E+00	**4.70E-01**
Hexane[e]	9.20E-04	3.68E-01	4.60E-01	1.53E-01
Isooctane	4.00E-05	1.60E-02	2.00E-02	6.67E-03
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]	4.80E-05	1.92E-02	2.40E-02	8.00E-03
Toluene[e]	1.50E-04	6.00E-02	7.50E-02	2.50E-02
Xylene[e]	2.00E-04	8.00E-02	1.00E-01	3.33E-02
POM (7-PAH Group)		2.19E-04		**8.30E-05**

Pollutant	Emission Factor[a] (lb/ton)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	7.40E-05	2.96E-02	3.70E-02	**1.12E-02**
3-Methylchloranthrene[e]				
Acenaphthene	1.40E-06	5.60E-04	7.00E-04	**2.12E-04**
Acenaphthylene	8.60E-06	3.44E-03	4.30E-03	**1.30E-03**
Anthracene	2.20E-07	8.80E-05	1.10E-04	**3.33E-05**
Benzo(a)anthracene	2.10E-07	8.40E-05	1.05E-04	**3.18E-05**
Benzo(a)pyrene[e]	9.80E-09	3.92E-06	4.90E-06	**1.48E-06**
Benzo(b)fluoranthene	1.00E-07	4.00E-05	5.00E-05	**1.52E-05**
Benzo(e)pyrene	1.10E-07	4.40E-05	5.50E-05	**1.67E-05**
Benzo(g,h,I)perylene	4.00E-08	1.60E-05	2.00E-05	**6.06E-06**
Benzo(k)fluoranthene	4.10E-08	1.64E-05	2.05E-05	**6.21E-06**
Chrysene	1.80E-07	7.20E-05	9.00E-05	**2.73E-05**
Dibenzo(a,h)anthracene				
Dichlorobenzene				
Fluoranthene	6.10E-07	2.44E-04	3.05E-04	**9.24E-05**
Fluorene	3.80E-06	1.52E-03	1.90E-03	**5.76E-04**
Indeno(1,2,3-cd)pyrene	7.00E-09	2.80E-06	3.50E-06	**1.06E-06**
Naphthalene[e]	9.00E-05	3.60E-02	4.50E-02	**1.36E-02**
Perylene	8.80E-09	3.52E-06	4.40E-06	**1.33E-06**
Phenanthrene	7.60E-06	3.04E-03	3.80E-03	**1.15E-03**
Pyrene	5.40E-07	2.16E-04	2.70E-04	**8.18E-05**
Non-HAPs Organic Compounds[f]				
Acetone[e]				
Benzaldehyde				
Butane	6.70E-04	2.68E-01	3.35E-01	1.12E-01
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene	7.00E-03	2.80E+00	3.50E+00	1.17E+00
Heptane	9.40E-03	3.76E+00	4.70E+00	1.57E+00
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene	4.00E-03	1.60E+00	2.00E+00	6.67E-01
2-Methyl-2-butene	5.80E-04	2.32E-01	2.90E-01	9.67E-02
3-Methylpentane	1.90E-04	7.60E-02	9.50E-02	3.17E-02
1-Pentene	2.20E-03	8.80E-01	1.10E+00	3.67E-01
n-Pentane	2.10E-04	8.40E-02	1.05E-01	3.50E-02
Valeraldehyde				
Metals[g]				
Antimony[e]	1.80E-07	7.20E-05	9.00E-05	3.00E-05
Arsenic[e]	5.60E-07	2.24E-04	2.80E-04	**8.48E-05**
Barium[e]	5.80E-06	2.32E-03	2.90E-03	9.67E-04
Beryllium[e]				
Cadmium[e]	4.10E-07	1.64E-04	2.05E-04	**6.21E-05**
Chromium[e]	5.50E-06	2.20E-03	2.75E-03	9.17E-04
Cobalt[e]	2.60E-08	1.04E-05	1.30E-05	4.33E-06
Copper[e]	3.10E-06	1.24E-03	1.55E-03	5.17E-04
Hexavalent Chromium[e]	4.50E-07	1.80E-04	2.25E-04	**6.82E-05**
Manganese[e]	7.70E-06	3.08E-03	3.85E-03	1.28E-03
Mercury[e]	2.40E-07	9.60E-05	1.20E-04	4.00E-05
Molybdenum[e]				
Nickel[e]	6.30E-05	2.52E-02	3.15E-02	**9.55E-03**
Phosphorus[e]	2.80E-05	1.12E-02	1.40E-02	4.67E-03
Silver[e]	4.80E-07	1.92E-04	2.40E-04	8.00E-05
Selenium[e]	3.50E-07	1.40E-04	1.75E-04	5.83E-05
Thallium[e]	4.10E-09	1.64E-06	2.05E-06	6.83E-07
Vanadium[e]				
Zinc[e]	6.10E-05	2.44E-02	3.05E-02	1.02E-02

a) Emission factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04
b) AP-42, Table 11.1-3, Particulate Matter Emission Factors for Drum Mix Hot Asphalt Plants, 3/04
b1) AP-42, Table 11.1-4, Summary of Particle Size Distribution for Drum Mix Dryers **(Emission Rating Factor E - "Poor")**
c) AP-42, Table 11.1-7, Emission Factors for CO. CO2, NOx, and SO2 from Drum Mix Hot Asphalt Plants, 3/04
c1) AP-42, Table 1.5-1, Emission Factors for LPG Combustion, note (a): "Assumes emissions (except SOx and NOx) are the same, on a heat input basis, as for natural gas combustion. The NOx emission factors have been multiplied by a factor of 1.5, which is the approximate ration of propane/butane NOx emissions to natural gas NOx emissions.
d) AP-42, Table 11.1-8, Emission Factors for TOC, Methane, VOC, and HCl from Drum Mix Hot Asphalt Plants, 3/04
e) IDAPA Toxic Air Pollutant
f) AP-42, Table 11.1-10, Emission Factors for Organic Pollutant Emissions from Drum Mix Hot Asphalt Plants, 3/04
g) AP-42, Table 11.1-12, Emission Factors for Metal Emissions from Drum Mix Hot Mix Asphalt Plants, 3/04

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:42 **Permit/Facility ID:** **0** **0**

Asphalt Tank Heater - #2 Oil Fired, Estimated Emissions Using AP-42 Sections 11.1 (HMA Plants) & 1.3 (Fuel Oil Combustion)

Fuel Type Toggle = 0

Fuel Consumption Rate 72.98 gal/hr

Max Daily Operation 24 hr/day

Max Annual Operation 4,000 hrs/yr

User Input Weight % Sulfu 0.5000%

AP-42 1.3-1 EF is 0.142S lb SO2 per gallon of fuel oil

Pollutant	Emission Factor[a] (lb/gal)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)[b] (filterable+cond)	0.0033	0.00E+00	0.00	
PM-10 (total)[b] (filterable+con	0.0023	0.00E+00	0.00	
PM-2.5 (total)[b] (filterable+co	0.00154	0.000	0.00	
CO[b] ("C" EF Rating Factor	0.005	0.00E+00	0.00	
NOx[b]	0.024	0.00E+00	0.00	
SO_2[b]	0.071	0.00	0.00	
VOC[d] (NMTOC EF)	5.56E-04	0.00E+00	0.00E+00	
Lead[f]	1.51E-06	0.00E+00	0.00E+00	
HCl[e]				
Dioxins[e]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD[c]	6.90E-13	0.00E+00	0.00E+00	**0.00E+00**
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD[c]	7.60E-13	0.00E+00	0.00E+00	**0.00E+00**
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD[c]	1.50E-11	0.00E+00	0.00E+00	**0.00E+00**
Total $HpCDD_c$	2.00E-11	0.00E+00	0.00E+00	**0.00E+00**
Octa CDD[c]	1.60E-10	0.00E+00	0.00E+00	**0.00E+00**
Total PCDD[c]	2.00E-10	0.00E+00	0.00E+00	**0.00E+00**
Furans[e]				
2,3,7,8-TCDF				
Total TCDF[c]	3.30E-12	0.00E+00	0.00E+00	**0.00E+00**
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF[c]	4.80E-13	0.00E+00	0.00E+00	**0.00E+00**
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF[c]	2.00E-12	0.00E+00	0.00E+00	**0.00E+00**
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF[c]	9.70E-12	0.00E+00	0.00E+00	**0.00E+00**
Octa CDF[c]	1.20E-11	0.00E+00	0.00E+00	**0.00E+00**
Total PCDF[c]	3.10E-11	0.00E+00	0.00E+00	**0.00E+00**
Total PCDD/PCDF[c]	2.30E-10	0.00E+00	0.00E+00	**0.00E+00**

Pollutant	Emission Factor[a] (lb/gal)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs				
2-Methylnaphthalene				
3-Methylchloranthrene[e]				
Acenaphthene[c]	5.30E-07	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthylene[c]	2.00E-07	0.00E+00	0.00E+00	**0.00E+00**
Anthracene[c]	1.80E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene				
Benzo(a)pyrene[e]				
Benzo(b)fluoranthene[c]	1.00E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene				
Benzo(g,h,I)perylene				
Benzo(k)fluoranthene				
Chrysene				
Dibenzo(a.h)anthracene				
Dichlorobenzene				
Fluoranthene[c]	4.40E-08	0.00E+00	0.00E+00	**0.00E+00**
Fluorene[c]	3.20E-08	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene				
Naphthalene[c,e]	1.70E-05	0.00E+00	0.00E+00	**0.00E+00**
Perylene				
Phenanthrene[c]	4.90E-06	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[c]	3.20E-08	0.00E+00	0.00E+00	**0.00E+00**
Non-HAP Organic Compounds				
Acetone[e]				
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals[f]				

Non-PAH HAPs					Antimony[e]	5.25E-06	0.00E+00	0.00E+00	0.00E+00
Acetaldehyde[e]					**Arsenic[e]**	1.32E-06	0.00E+00	0.00E+00	**0.00E+00**
Acrolein[e]					Barium[e]	2.57E-06	0.00E+00	0.00E+00	0.00E+00
Benzene[e]					**Beryllium[e]**	2.78E-08	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[e]					**Cadmium[e]**	3.98E-07	0.00E+00	0.00E+00	**0.00E+00**
Ethylbenzene[e]					Chromium[e]	8.45E-07	0.00E+00	0.00E+00	0.00E+00
Formaldehyde[c,e]	3.50E-06	0.00E+00	0.00E+00	**0.00E+00**	Cobalt[e]	6.02E-06	0.00E+00	0.00E+00	0.00E+00
Hexane[e]					Copper[e]	1.76E-06	0.00E+00	0.00E+00	0.00E+00
Isooctane					**Hexavalent Chromium[e]**	2.48E-07	0.00E+00	0.00E+00	**0.00E+00**
Methyl Ethyl Ketone[e]					Manganese[e]	3.00E-06	0.00E+00	0.00E+00	0.00E+00
Pentane[e]					Mercury[e]	1.13E-07	0.00E+00	0.00E+00	0.00E+00
Propionaldehyde[e]					Molybdenum[f]	7.87E-07	0.00E+00	0.00E+00	0.00E+00
Quinone[e]					**Nickel[e]**	8.45E-05	0.00E+00	0.00E+00	**0.00E+00**
Methyl chloroform[e]					Phosphorus[f]	9.46E-06	0.00E+00	0.00E+00	0.00E+00
Toluene[e]					Silver[e]				
Xylene[e]					Selenium[f]	6.83E-07	0.00E+00	0.00E+00	0.00E+00
					Thallium[f]				
					Vanadium[f]	3.18E-05	0.00E+00	0.00E+00	0.00E+00
POM (7-PAH Group)		0.00E+00		**0.00E+00**	Zinc[e]	2.91E-05	0.00E+00	0.00E+00	0.00E+00

a) Emission factors for criteria pollutants are from AP-42, 1.3, Fuel Oil Combustion, 9/98; all other factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04

b) AP-42, Table 1.3-1, Criteria Pollutant Emission Factors for Fuel Oil Combustion, 9/98, Boilers < 100 MMBtu, SOx based on max fuel sulfur content, PM10 is 1.3 lb/1,000 gal + 50% of 2.0 lb/1,000 gal

c) AP-42, Table 11.1-13, Emission Factors for Hot Mix Asphalt Hot Oil Systems, 3/04

d) AP-42, Table 1.3-3, Emission Factors for Total Organic Compounds (TOC), Methane, and Nonmethane TOC (NMTOC) from Uncontrolled Distillate Fuel Oil Combustion; Commercial Boiler

e) IDAPA Toxic Air Pollutant

f) AP-42, Table 1.3-11, Emission Factors for Metals from Uncontrolled No. 6 Fuel Oil Combustion

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

Asphalt Tank Heater - Natural Gas Fired, Estimated Emissions Using AP-42 Section 11.1 (Hot Mix Asphalt Plants)

Fuel Type Toggle = 0
Fuel Consumption Rate 9,804 scf/hr
Max Daily Operation 24 hr/day
Max Annual Operation 4,000 hrs/yr

Note: CO EF per AP-42 Table 1.4.1 for natural gas combustion in boilers is 84 lb/MMscf, a factor of 10 higher than the factor shown in Table 11.1-13
Tank heater CO emissions are based on using 84 lb/MMscf

Pollutant	Emission Factor[a] (lb/scf)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)				
PM-10 (total)				
PM-2.5				
CO [c]	**8.90E-06**	0.00E+00	0.00E+00	
NOx				
SO_2				
VOC				
Lead				
HCl [e]				
Dioxins[e]				
-- No EFs for Natural Gas Fuel --				
Furans[e]				
-- No EFs for Natural Gas Fuel --				
Non-PAH HAPs				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]				
1,3-Butadiene[e]				
Ethylbenzene[e]				
Formaldehyde[c,e]	2.60E-08	0.00E+00	0.00E+00	**0.00E+00**
Hexane[e]				
Isooctane				
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]				
Toluene[e]				
Xylene[e]				
POM (7-PAH Group)		0.00E+00		**0.00E+00**

Pollutant	Emission Factor[a] (lb/scf)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs				
2-Methylnaphthalene				
3-Methylchloranthrene[e]				
Acenaphthene				
Acenaphthylene				
Anthracene				
Benzo(a)anthracene				
Benzo(a)pyrene[e]				
Benzo(b)fluoranthene				
Benzo(e)pyrene				
Benzo(g,h,I)perylene				
Benzo(k)fluoranthene				
Chrysene				
Dibenzo(a,h)anthracene				
Dichlorobenzene				
Fluoranthene				
Fluorene				
Indeno(1,2,3-cd)pyrene				
Naphthalene[e]				
Perylene				
Phenanthrene				
Pyrene				
Non-HAPs Organic Compounds				
Acetone[e]				
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[e]				
Arsenic[e]				
Barium[e]				
Beryllium[e]				
Cadmium[e]				
Chromium[e]				
Cobalt[e]				
Copper[e]				
Hexavalent Chromium[e]				
Manganese[e]				
Mercury[e]				
Molybdenum[e]				
Nickel[e]				
Phosphorus[e]				
Silver[e]				
Selenium[e]				
Thallium[e]				
Vanadium[e]				
Zinc[e]				

a) Emission factors are from AP-42
b) (reserved)
c) AP-42, Table 11.1-13, Emission Factors for Hot Mix Asphalt Hot Oil Systems, 3/04
d) (reserved)
e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

Asphalt Tank Heater - Natural Gas Fired, Estimated Emissions Using AP-42 Section 1.4 (Natural Gas Combustion)

Fuel Type Toggle = 0
Fuel Consumption Rate 9,804 scf/hr
Max Daily Operation 24 hr/day
Max Annual Operation 4,000 hrs/yr
Heating Value Correction: 1.000 applied to Emissions (lb/hr, T/yr) calculations

Note: CO EF per AP-42 Table 1.4.1 for natural gas combustion in boilers is 84 lb/MMscf, a factor of 10 higher than the factor shown in Table 11.1-13
Tank heater CO emissions are based on using 84 lb/MMscf

Pollutant	Emission Factor[a] (lb/MMscf)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)[c]	7.6	0.00E+00	0.00E+00	
PM-10 (total)[c]	7.6	0.00E+00	0.00E+00	
PM-2.5	7.6	0.00E+00	0.00E+00	
CO [b]	**84**	0.00E+00	0.00E+00	
NOx [b]	100	0.00E+00	0.00E+00	
SO_2 [c]	0.6	0.00E+00	0.00E+00	
VOC [c]	5.5	0.00E+00	0.00E+00	
Lead [c]	5.00E-04	0.00E+00	0.00E+00	
HCl [e]				
Dioxins[e]				
-- No EFs for Natural Gas Fuel --				
Furans[e]				
-- No EFs for Natural Gas Fuel --				
Non-PAH HAPs[f]				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[c1, e]	2.10E-03	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[e]				
Ethylbenzene[e]				
Formaldehyde[e]	7.50E-02	0.00E+00	0.00E+00	**0.00E+00**
Hexane[e]	1.80E+00	0.00E+00	0.00E+00	0.00E+00
Isooctane				
Methyl Ethyl Ketone[e]				
Pentane[c1, e]	2.60E+00	0.00E+00	0.00E+00	0.00E+00
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]				
Toluene[c1, e]	3.40E-03	0.00E+00	0.00E+00	0.00E+00
Xylene[e]				
POM (7-PAH Group)		0.00E+00		**0.00E+00**

Pollutant	Emission Factor[a] (lb/MMscf)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene[c1]	2.40E-05	0.00E+00	0.00E+00	**0.00E+00**
3-Methylchloranthrene[c1, e]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthylene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Anthracene[c1]	2.40E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)pyrene[c1, e]	1.20E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(b)fluoranthenec[1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene				
Benzo(g,h,I)perylene[c1]	1.20E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(k)fluoranthene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Chrysene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Dibenzo(a,h)anthracene[c1]	1.20E-06	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene[c1]	1.20E-03	0.00E+00	0.00E+00	**0.00E+00**
Fluoranthene[c1]	3.00E-06	0.00E+00	0.00E+00	**0.00E+00**
Fluorene[c1]	2.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene[c1]	1.80E-06	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[c1, e]	6.10E-04	0.00E+00	0.00E+00	**0.00E+00**
Perylene				
Phenanthrene[c1]	1.70E-05	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[c1]	5.00E-06	0.00E+00	0.00E+00	**0.00E+00**
Non-HAPs Organic Compounds[f]				
Acetone[e]				
Benzaldehyde				
Butane[c1]	2.10E+00	0.00E+00	0.00E+00	0.00E+00
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals[g]				
Antimony[e]				
Arsenic[d,e]	2.00E-04	0.00E+00	0.00E+00	**0.00E+00**
Barium[d,e]	4.40E-03	0.00E+00	0.00E+00	0.00E+00
Beryllium[e]	1.20E-05	0.00E+00	0.00E+00	**0.00E+00**
Cadmium[d,e]	1.10E-03	0.00E+00	0.00E+00	**0.00E+00**
Chromium[d,e]	1.40E-03	0.00E+00	0.00E+00	0.00E+00
Cobalt[d,e]	8.40E-05	0.00E+00	0.00E+00	0.00E+00
Copper[d,e]	8.50E-04	0.00E+00	0.00E+00	0.00E+00
Hexavalent Chromium[e]				
Manganese[d,e]				
Mercury[d,e]				
Molybdenum[d,e]	1.10E-03	0.00E+00	0.00E+00	0.00E+00
Nickel[d,e]				
Phosphorus[e]				
Silver[e]				
Selenium[d,e]				
Thallium[e]				
Vanadium[d,e]	2.30E-03	0.00E+00	0.00E+00	0.00E+00
Zinc[d,e]				

a) Emission factors are from AP-42
b) AP-42, Table 1.4-1, Emission Factors for NOx and CO from Natural Gas Combustion, 7/98
c) AP-42, Table 1.4-2, Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion, 7/98
c1) AP-42, Table 1.4-3, Emission Factors for Speciated Organic Compounds from Natural Gas Combustion, 7/98
d) AP-42, Table 1.4-4, Emission Factors for Metals from Natural Gas Combustion, 7/98
e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:44 **Permit/Facility ID:** **0** **0**

Silo Filling Operations **AP-42 Section 11.1**

Emissions Toggle = 1
Max Hourly Production 400 T/hr
Max Daily Production 4,000 Tons/day
Max Annual Production 1,000,000 Tons/yr

Pollutant	Emission Factor[a] Silo Fill (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total)[b,h]	5.86E-07	0.0002	0.0003	
PM-10 (total)[b,h]	5.86E-07	0.0002	0.0003	
PM-2.5[b,h]	5.86E-07	0.0002	0.0003	
CO[b]	1.18E-03	0.4720	0.5900	
NOx				
SO_2				
VOC[d,g]	1.22E-04	4.87E-02	0.0609	
Lead				
HCl[d,e]	No Data			
Dioxins[e]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD				
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD				
Total HpCDD				
Octa CDD				
Total PCDD[h]				
Furans[e]				
2,3,7,8-TCDF				
Total TCDF				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF				
Octa CDF				
Total PCDF				
Total PCDD/PCDF				
Non-PAH HAPs				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]	3.90E-06	1.56E-03	1.95E-03	**0.0006**
1,3-Butadiene[e]				
Ethylbenzene[e]	4.63E-06	1.85E-03	2.32E-03	7.72E-04
Formaldehyde[e]	8.41E-05	3.36E-02	4.20E-02	**0.0127**
Hexane[e]	1.22E-05	4.87E-03	6.09E-03	2.03E-03
Isooctane	3.78E-08	1.51E-05	1.89E-05	6.30E-06
Methyl Ethyl Ketone[e]	4.75E-06	1.90E-03	2.38E-03	7.92E-04
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]		0.00E+00	0.00E+00	
Toluene[e]	7.56E-06	3.02E-03	3.78E-03	1.26E-03
Xylene[e]	3.13E-05	1.25E-02	1.57E-02	5.22E-03
POM (7-PAH Group)		2.70E-04		**1.02E-04**

Pollutant	Emission Factor[a] Silo Fill (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	1.34E-05	5.35E-03	6.69E-03	**2.03E-03**
3-Methylchloranthrene[e]				
Acenaphthene	1.19E-06	4.77E-04	5.97E-04	**1.81E-04**
Acenaphthylene	3.55E-08	1.42E-05	1.78E-05	**5.39E-06**
Anthracene	3.30E-07	1.32E-04	1.65E-04	**5.00E-05**
Benzo(a)anthracene	1.42E-07	5.69E-05	7.11E-05	**2.15E-05**
Benzo(a)pyrene[e]	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Benzo(b)fluoranthene	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene	2.41E-08	9.65E-06	1.21E-05	**3.65E-06**
Benzo(g,h,I)perylene	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Benzo(k)fluoranthene	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Chrysene	5.33E-07	2.13E-04	2.67E-04	**8.08E-05**
Dibenzo(a,h)anthracene	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene				
Fluoranthene	3.81E-07	1.52E-04	1.90E-04	**5.77E-05**
Fluorene	2.56E-06	1.03E-03	1.28E-03	**3.89E-04**
Indeno(1,2,3-cd)pyrene	0.00E+00	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[e]	4.62E-06	1.85E-03	2.31E-03	**7.00E-04**
Perylene	7.62E-08	3.05E-05	3.81E-05	**1.15E-05**
Phenanthrene	4.57E-06	1.83E-03	2.29E-03	**6.92E-04**
Pyrene	1.12E-06	4.47E-04	5.59E-04	**1.69E-04**
Non-HAP Organic Compounds				
Acetone[e]	6.70E-06	2.68E-03	0.0034	1.12E-03
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene	1.34E-04	5.36E-02	0.0670	2.23E-02
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[e]				
Arsenic[e]				
Barium[e]				
Beryllium[e]				
Cadmium[e]				
Chromium[e]				
Cobalt[e]				
Copper[e]				
Hexavalent Chromium[e]				
Manganese[e]				
Mercury[e]				
Molybdenum[e]				
Nickel[e]				
Phosphorus[e]				
Silver[e]				
Selenium[e]				
Thallium[e]				
Vanadium[e]				
Zinc[e]				

a) Emission factors are from AP-42 11.1, Hot Mix Asphalt Plants, 3/04

b) AP-42, Table 11.1-14, Predictive Emission Factor Equations for Load-Out and Silo Filling Operations, 3/04 Defaults: (-V) = 0.5 T (°F) = 325

		LOADOUT	**SILO FILL**	
Total PM EF = $0.000181+0.00141(-V)e^{((0.0251)(T+460)-20.43)}$ + 000332+ $0.00105(-V)e^{((0.0251)(T+460)-20.43)}$	=	5.219E-04	5.859E-04	(split addends)
Organic PM EF = $0.00141(-V)e^{((0.0251)(T+460)-20.43)}$ + $0.00105(-V)e^{((0.0251)(T+460)-20.43)}$	=	3.409E-04	2.539E-04	(split addends)
TOC PM EF = $0.0172(-V)e^{((0.0251)(T+460)-20.43)}$ + $0.0504(-V)e^{((0.0251)(T+460)-20.43)}$	=	4.159E-03	1.219E-02	(split addends)
CO PM EF = $0.00558(-V)e^{((0.0251)(T+460)-20.43)}$ + $0.00488(-V)e^{((0.0251)(T+460)-20.43)}$	=	1.349E-03	1.180E-03	(split addends)

e) IDAPA Toxic Air Pollutant

f) AP-42, Table 11.1-15, Speciation Profiles for Load-out, Silo Filling, & Asphalt Storage--Organic Particulate-Based Compounds, 3/04 (EF=Spec% * Organic PM EF)

g) AP-42, Table 11.1-16, Speciation Profiles for Load-out, Silo Filling, &Asphalt Storage--Organic Volatile-Based Compounds, 3/04, (EF=Spec% * TOC PM EF)

h) Baghouse efficiency of 99.9% is applied to Silo particulate emissions due to reinjection.

Pollutants shown in bold text are carcinogens subject to an annual standard. These lb/hr values are annual averages.

Pollutants shown in blue text are organic volatile-based compounds, EF = Spec% x TOC PM EF.

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:44 **Permit/Facility ID:** **0** **0**

Silo Filling Operations AP-42 Section 11.1, Page 2

Fuel Type Toggle =	1	
Max Hourly Production	400	T/hr
Max Daily Production	4,000	Tons/day
Max Annual Production	1,000,000	Tons/yr

Pollutant	Emission Factor[a] Silo Fill (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
non-PAH HAPs[g]				
Bromomethane[e]	5.97E-07	2.39E-04	0.0003	9.95E-05
2-Butanone (see Methyl Ethyl Ketone)				
Carbon disulfide[e]	1.95E-06	7.80E-04	0.0010	3.25E-04
Chloroethane (Ethyl chloride[e])	4.87E-07	1.95E-04	0.0002	8.12E-05
Chloromethane (Methyl chloride[e])	2.80E-06	1.12E-03	0.0014	4.67E-04
Cumene[e]				
n-Hexane (see Hexane[e])				
Methylene chloride (Dichloromethane[e])	3.29E-08	1.32E-05	1.65E-05	5.48E-06
MTBE				
Styrene[e]	6.58E-07	2.63E-04	3.29E-04	1.10E-04
Tetrachloroethene (Tetrachloroethylene[e])	0.00E+00	0.00E+00	0.00E+00	0.00E+00
1,1,1-Trichloroethane (Methyl chloroform[e])	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Trichloroethene (Trichloroethylene[e])				
Trichlorofluoromethane				
m-/p-Xylene[e] (added into Xylene[e])	2.44E-05	9.75E-03	0.0122	4.06E-03
o-Xylene[e] (added into Xylene[e])	6.95E-06	2.78E-03	0.0035	1.16E-03
Phenol[e,f]				
Non-HAP Organic Compounds				
Methane	3.17E-03	1.27E+00	1.5843	5.28E-01

Pollutants shown in blue text are organic volatile-based compounds, EF = Spec% x TOC PM EF.

Facility: Interstate Concrete & Asphalt - 00617

6/7/2021 9:52 Permit/Facility ID 0 0

Load-out Operations AP-42 Section 11.1

Emissions Toggle = 1

Max Hourly Production 400 T/hr

Max Daily Production 4,000 Tons/day

Max Annual Production 1,000,000 Tons/yr

Pollutant	Emission Factor[a] Loadout (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual**or 24-hr Average
PM (total)[b]	5.22E-04	0.209	0.26	
PM-10 (total)[b]	5.22E-04	0.209	0.26	
PM-2.5[b]	5.22E-04	0.209	0.26	
CO[b]	1.35E-03	0.540	0.67	
NOx				
SO_2				
VOC[d,g]	3.91E-03	1.564	1.95	
Lead				
HCl[d,e]	No Data			
Dioxins				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD				
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD				
Total HpCDD				
Octa CDD				
Total PCDD[h]				

Pollutant	Emission Factor[a] Loadout (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual**or 24-hr Average
PAH HAPs[f]				
2-Methylnaphthalene	8.11E-06	3.25E-03	4.06E-03	**1.23E-03**
3-Methylchloranthrene				
Acenaphthene	8.86E-07	3.55E-04	4.43E-04	**1.34E-04**
Acenaphthylene	9.55E-08	3.82E-05	4.77E-05	**1.45E-05**
Anthracene	2.39E-07	9.55E-05	1.19E-04	**3.62E-05**
Benzo(a)anthracene	6.48E-08	2.59E-05	3.24E-05	**9.81E-06**
Benzo(a)pyrene	7.84E-09	3.14E-06	3.92E-06	**1.19E-06**
Benzo(b)fluoranthene	2.59E-08	1.04E-05	1.30E-05	**3.93E-06**
Benzo(e)pyrene	2.66E-08	1.06E-05	1.33E-05	**4.03E-06**
Benzo(g,h,I)perylene	6.48E-09	2.59E-06	3.24E-06	**9.81E-07**
Benzo(k)fluoranthene	7.50E-09	3.00E-06	3.75E-06	**1.14E-06**
Chrysene	3.51E-07	1.40E-04	1.76E-04	**5.32E-05**
Dibenzo(a,h)anthracene	1.26E-09	5.05E-07	6.31E-07	**1.91E-07**
Dichlorobenzene				
Fluoranthene	1.70E-07	6.82E-05	8.52E-05	**2.58E-05**
Fluorene	2.63E-06	1.05E-03	1.31E-03	**3.98E-04**
Indeno(1,2,3-cd)pyrene	1.60E-09	6.41E-07	8.01E-07	**2.43E-07**
Naphthalene	4.26E-06	1.70E-03	2.13E-03	**6.46E-04**
Perylene	7.50E-08	3.00E-05	3.75E-05	**1.14E-05**
Phenanthrene	2.76E-06	1.10E-03	1.38E-03	**4.18E-04**
Pyrene	5.11E-07	2.05E-04	2.56E-04	**7.75E-05**

Facility: Interstate Concrete & Asphalt - 00617

6/7/2021 9:52 Permit/Facility ID 0 0

Load-out Operations AP-42 Section 11.1, Page 2

Fuel Type Toggle = 1

Max Hourly Production 400 T/hr

Max Daily Production 4,000 Tons/day

Max Annual Production 1,000,000 Tons/yr

Pollutant	Emission Factor[a] Loadout (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual**or 24-hr Average
non-PAH HAPs				
Bromomethane	3.99E-07	1.60E-04	2.00E-04	6.65E-05
2-Butanone (see Methyl Ethyl Ketone)				
Carbon disulfide	5.41E-07	2.16E-04	2.70E-04	9.01E-05
Chloroethane (Ethyl chloride)	8.73E-09	3.49E-06	4.37E-06	1.46E-06
Chloromethane (Methyl chloride)	6.24E-07	2.50E-04	3.12E-04	1.04E-04
Cumene	4.57E-06	1.83E-03	2.29E-03	7.62E-04
n-Hexane (see Hexane)				
Methylene chloride (Dichloromethane)				
MTBE				
Styrene	3.04E-07	1.21E-04	1.52E-04	5.06E-05
Tetrachloroethene (Tetrachloroethylene)	3.20E-07	1.28E-04	1.60E-04	5.34E-05
1,1,1-Trichloroethane (Methyl chloroform)				
Trichloroethene (Trichloroethylene)				
Trichlorofluoromethane	5.41E-08	2.16E-05	2.70E-05	9.01E-06
m-/p-Xylene (added into Xylene)	1.71E-05	6.82E-03	8.53E-03	2.84E-03
o-Xylene (added into Xylene)	3.33E-05	1.33E-02	1.66E-02	5.55E-03
Phenol[c,f]	4.02E-06	1.61E-03	2.01E-03	6.71E-04

Furans[g]				
2,3,7,8-TCDF				
Total TCDF				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF				
Octa CDF				
Total PCDF[h]				
Total PCDD/PCDF[h]				
Non-PAH HAPs				
Acetaldehyde[e]				
Acrolein[e]				
Benzene[e]	2.16E-06	8.65E-04	1.08E-03	**3.28E-04**
1,3-Butadiene[e]				
Ethylbenzene[e]	1.16E-05	4.66E-03	5.82E-03	1.94E-03
Formaldehyde[e]	3.66E-06	1.46E-03	1.83E-03	**5.55E-04**
Hexane[e]	6.24E-06	2.50E-03	3.12E-03	1.04E-03
Isooctane	7.49E-08	2.99E-05	3.74E-05	1.25E-05
Methyl Ethyl Ketone[e]	2.04E-06	8.15E-04	1.02E-03	3.40E-04
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[i]				
Toluene[e]	8.73E-06	3.49E-03	4.37E-03	1.46E-03
Xylene[e]	5.03E-05	2.01E-02	2.52E-02	8.39E-03
POM (7-PAH Group)		1.84E-04		**6.97E-05**

Non-HAP Organic Compounds				
Acetone[e]	1.95E-06	7.79E-04	9.73E-04	3.24E-04
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene	2.95E-05	1.18E-02	1.48E-02	4.92E-03
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[f]				
Arsenic[e]				
Barium[f]				
Beryllium[e]				
Cadmium[e]				
Chromium[f]				
Cobalt[f]				
Copper[f]				
Hexavalent Chromium[f]				
Manganese[f]				
Mercury[f]				
Molybdenum[f]				
Nickel[f]				
Phosphorus[f]				
Silver[f]				
Selenium[f]				
Thallium[f]				
Vanadium[f]				
Zinc[f]				

Non-HAP Organic Compounds				
Methane	2.70E-04	1.08E-01	1.35E-01	4.51E-02

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit** **0** **Facility ID:** **0**

G1 Electrical Generator < 600 hp (447 kW)

Fuel Type Toggle =	0	
Fuel Consumption Rate	15.63	gal/hr
Calculated MMBtu/hr	2.142	MMBtu/hr
Max Daily Operation	12	hr/day
Max Annual Operation	4,380	hrs/yr

Rated Power (kW): **228**

Not EPA Certified:	Yes
Certified EPA Tier 1:	No
Certified EPA Tier 2:	No
Certified EPA Tier 3:	No
Certified EPA Tier 4*:	No
Blue Sky Engine:	No

Conversion Factors:

Avg brake-specific fuel consumption (BSFC) =	7000	Btu/hp-hr
1 hp =	0.746	kW
1 lb =	453.592	g

g/kW-hr x (lb/453g) x (hp-hr/7000 Btu) x (0.746 kW/hp) x 10^6 Btu/MMBtu = lb/MMBtu
g/kW-hr x 0.23486 = lb/MMBtu

**Tier 4 emission factors from https://www.epa.gov/sites/production/files/2018-02/documents/02-update-tier-4-nonroad-diesel-engines-2017-12-06.pdf and 40 CFR 1039.101*

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM = PM10
EMISSION FACTORS USED FOR G1 (lb/MMBtu):	**4.41**	**0.36**		**0.95**	**0.310**

AP-42, Ch 3.3 (10/96) EMISSION FACTORS (diesel fueled)

Pollutant:		NOx	VOC (total TOC--> VOCs)		CO	PM = PM10
Emission Factor (lb/MMBtu)		4.41	0.36		0.95	0.31
Emission Factor (g/kW-hr))		18.78	1.53		4.05	1.32

40 CFR 89, EPA CERTIFIED GENERATOR EMISSION FACTORS (g/kW-hr converted to lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM = PM10
kW< 8	1	0	2000	---	*0.36*	2.47	1.88	0.23
kW< 8	2	0	2005	---	*0.36*	1.76	1.88	0.09
kW< 8	4	0	2008	---	*0.36*	1.76	1.88	0.19
kW< 8	BlueSky	0	n/a	---	*0.36*	1.08	*1.88*	0.11
8 ≤ kW < 19	1	0	2000	---	*0.36*	2.23	1.55	0.19
8 ≤ kW < 19	2	0	2005	---	*0.36*	1.76	1.55	0.19
8 < kW < 19	4	0	2008	---	*0.36*	1.76	1.55	0.09
8 ≤ kW < 19	BlueSky	0	n/a	---	*0.36*	1.06	*1.55*	0.11
19 ≤ kW < 37	1	0	1999	---	*0.36*	2.23	1.29	0.19
19 ≤ kW < 37	2	0	2004	---	*0.36*	1.76	1.29	0.14
19 ≤ kW < 37	4	0	2008	---	*0.36*	1.76	1.29	0.07
19 < kW < 37	4	0	2013	---	*0.36*	1.10	1.29	0.01
19 ≤ kW < 37	BlueSky	0	n/a	---	*0.36*	1.06	*1.29*	0.085
37 ≤ kW < 56	1	0	1998	2.16	*0.36*	---	*0.95*	*0.31*
37 ≤ kW < 56	2	0	2004	---	*0.36*	1.76	1.17	0.09
37 ≤ kW < 56	3	0	2008	---	*0.36*	1.10	1.17	0.09
37 ≤ kW < 56	4	0	2008	---	*0.36*	1.10	1.17	0.07
37 ≤ kW < 56	4	0	2012	---	*0.36*	1.10	1.17	0.07
37 ≤ kW < 56	4	0	2013	---	*0.36*	1.10	1.17	0.01
37 ≤ kW < 56	BlueSky	0	n/a	---	*0.36*	1.10	*1.17*	0.056
56 ≤ kW < 75	1	0	1998	2.16	*0.36*	---	*0.95*	*0.31*
56 ≤ kW < 75	2	0	2004	---	*0.36*	1.76	1.17	0.09
56 ≤ kW < 75	3	0	2008	---	*0.36*	1.10	1.17	0.09
56 ≤ kW < 75	4	0	2012	---	0.04	0.80	1.17	0.005
56 ≤ kW < 75	4	0	2015	0.80	0.04	--	1.17	0.005
56 ≤ kW < 75	BlueSky	0	n/a	---	*0.36*	1.10	*1.17*	0.056
75 ≤ kW < 130	1	0	1997	2.16	*0.36*	---	*0.95*	*0.31*
75 ≤ kW < 130	2	0	2003	---	*0.36*	1.55	1.17	0.07
75 ≤ kW < 130	3	0	2007	---	*0.36*	0.94	1.17	0.07
75 ≤ kW < 130	4	0	2012	---	0.04	0.80	1.17	0.005
75 ≤ kW < 130	4	0	2015	0.80	0.04	--	1.17	0.005
75 ≤ kW < 130	BlueSky	0	n/a	---	*0.36*	0.94	1.17	0.042
130 ≤ kW < 225	1	0	1996	2.16	0.31	---	2.68	0.13
130 ≤ kW < 225	2	0	2003	---	*0.31*	1.55	0.82	0.05
130 ≤ kW < 225	3	0	2006	---	*0.31*	0.94	0.82	0.05
130 ≤ kW < 225	4	0	2011	0.47	0.04	---	0.82	0.005
130 ≤ kW < 225	4	0	2014	0.47	0.04	---	0.82	0.005
130 ≤ kW ≤ 560	BlueSky	0	n/a	---	*0.31*	0.94	*0.82*	0.028
225 ≤ kW < 450	1	0	1996	2.16	0.31	---	2.68	0.13
225 ≤ kW < 450	2	0	2001	---	*0.31*	1.50	0.82	0.05
225 ≤ kW < 450	3	0	2006	---	*0.31*	0.94	0.82	0.05
225 ≤ kW < 450	4	0	2011	0.47	0.04	---	0.82	0.05
225 ≤ kW < 450	4	0	2014	0.47	0.04		0.82	0.05

40 CFR 89, EPA CERTIFIED GENERATOR EMISSION FACTORS FOR GENERATOR G1 (lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM10
kW< 8	1	0	2000	0.00	0.00	0.00	0.00	0.00
kW< 8	2	0	2005	0.00	0.00	0.00	0.00	0.00
kW< 8	4	0	2008	0.00	0.00	0.00	0.00	0.00
kW< 8	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	1	0	2000	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	2	0	2005	0.00	0.00	0.00	0.00	0.00
8 < kW < 19	4	0	2008	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	1	0	1999	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	2	0	2004	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	4	0	2008	0.00	0.00	0.00	0.00	0.00
19 < kW < 37	4	0	2013	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	1	0	1998	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	2	0	2004	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	3	0	2008	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	4	0	2008	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	4	0	2012	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	4	0	2013	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 56	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
56 ≤ kW < 75	1	0	1998	0.00	0.00	0.00	0.00	0.00
56 ≤ kW < 75	2	0	2004	0.00	0.00	0.00	0.00	0.00
56 ≤ kW < 75	3	0	2008	0.00	0.00	0.00	0.00	0.00
56 ≤ kW < 75	4	0	2012	0.00	0.00	0.00	0.00	0.00
56 ≤ kW < 75	4	0	2015	0.00	0.00	0.00	0.00	0.00

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

IC Engine 1 Powering an Electrical Generator < 600 hp (447 kW) AP-42 Section 3.3 (diesel fueled)

Fuel Type Toggle = 0 228 kw
Fuel Consumption Rate 15.63 gal/hr
Calculated MMBtu/hr 2.142 MMBtu/hr
Max Daily Operation 12 hr/day
Max Annual Operation 4,380 hrs/yr

User Input Weight % Sulfur = 0.0500%
AP-42 3.3 SO2 EF = 0.29 for #2 fuel oil, presumed max 0.5%
SO2 emissions are multiplied by a factor: User Input Value/0.5% = 0.10
Not an EPA-Certified Generator

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM (total) [b]	0.31	0.000	0.00E+00	
PM-10 (total) [b]	0.31	0.000	0.00E+00	
PM-2.5	0.07	0.000	0.00E+00	
CO [b]	0.95	0.000	0.00E+00	
NOx[b]	4.41	0.000	0.00E+00	
SO_2 [b] (total SOx presumed SO2)	0.29	0.00E+00	0.00E+00	
VOC [b] (total TOC--> VOCs)	0.36	0.000	0.00E+00	
Lead				
HCl [e]				
Dioxins[e]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD[c]				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD[c]				
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD[c]				
Total $HpCDD_c$				
Octa CDD[c]				
Total PCDD[c]				
Furans[e]				
2,3,7,8-TCDF				
Total TCDF[c]				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF[c]				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF[c]				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF[c]				
Octa CDF[c]				
Total PCDF[c]				
Total PCDD/PCDF[c]				
Non-PAH HAPs				
Acetaldehyde[c]	7.67E-04	0.00E+00	0.00E+00	**0.00E+00**
Acrolein[c]	9.25E-05	0.00E+00	0.00E+00	0.00E+00
Benzene[c,e]	9.33E-04	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[c,e]	3.91E-05	0.00E+00	0.00E+00	**0.00E+00**
Ethylbenzene[e]				
Formaldehyde[c,e]	1.18E-03	0.00E+00	0.00E+00	**0.00E+00**
Hexane[e]				
Isooctane				
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]				
Toluene[c,e]	4.09E-04	0.00E+00	0.00E+00	0.00E+00
Xylene[c,e]	2.85E-04	0.00E+00	0.00E+00	0.00E+00
POM (7-PAH Group)		0.00E+00		**0.00E+00**

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs				
2-Methylnaphthalene				
3-Methylchloranthrene[e]				
Acenaphthene[c]	1.42E-06	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthylene[c]	5.06E-06	0.00E+00	0.00E+00	**0.00E+00**
Anthracene[c]	1.87E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene[c]	1.68E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)pyrene[c,e]	1.88E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(b)fluoranthene[c]	9.91E-08	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene				
Benzo(g,h,I)perylene[c]	4.89E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(k)fluoranthene[c]	1.55E-07	0.00E+00	0.00E+00	**0.00E+00**
Chrysene[c]	3.53E-07	0.00E+00	0.00E+00	**0.00E+00**
Dibenzo(a,h)anthracene[c]	5.83E-07	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene				
Fluoranthene[c]	7.61E-06	0.00E+00	0.00E+00	**0.00E+00**
Fluorene[c]	2.92E-05	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene[c]	3.75E-07	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[c,e]	8.48E-05	0.00E+00	0.00E+00	**0.00E+00**
Perylene				
Phenanthrene[c]	2.94E-05	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[c]	4.78E-06	0.00E+00	0.00E+00	**0.00E+00**
Non-HAP Organic Compounds				
Acetone[e]				
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[e]				
Arsenic[e]				
Barium[e]				
Beryllium[e]				
Cadmium[e]				
Chromium[e]				
Cobalt[e]				
Copper[e]				
Hexavalent Chromium[e]				
Manganese[e]				
Mercury[e]				
Molybdenum[e]				
Nickel[e]				
Phosphorus[e]				
Silver[e]				
Selenium[e]				
Thallium[e]				
Vanadium[e]				
Zinc[e]				

a) Emission factors are from AP-42
b) AP-42, Table 3.3-1, Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines, 10/96
c) AP-42, Table 3.3-2, Speciated Organic Compoun Emission Factors for Uncontrolled Diesel Engine, **Emission Factor Rating E**, 10/96
d) (reserved)
e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00** **Facility ID:** **0**
6/7/2021 9:28 **Permit** **0**

Rated Power (kW): **866**

G2 Electrical Generator > 600 hp (447 kW)

Fuel Type Toggle =	0	
Fuel Consumption Rate	59.31	gal/hr
Calculated MMBtu/hr	8.13	MMBtu/hr
Max Daily Operation	12	hr/day
Max Annual Operation	4,380	hrs/yr

Not EPA Certified:	Yes
Certified EPA Tier 1:	No
Certified EPA Tier 2:	No
Certified EPA Tier 3:	No
Certified EPA Tier 4*	No
Blue Sky Engine:	No

Conversion Factors:

Avg brake-specific fuel consumption (BSFC) =	7000	Btu/hp-hr
1 hp =	0.746	kW
1 lb =	453.592	g

g/kW-hr x (lb/453g) x (hp-hr/7000 Btu) x (0.746 kW/hp) x 10^6 Btu/MMBtu = lb/MMBtu
g/kW-hr x 0.23486 = lb/MMBtu

**Tier 4 emission factors from https://www.epa.gov/sites/production/files/2018-02/documents/02-update-tier-4-nonroad-diesel-engines-2017-12-06.pdf and 40 CFR 1039.101;Genset EF's*

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM=PM10
EMISSION FACTORS USED FOR G2 (lb/MMBtu):	**3.20**	**0.09**		**0.85**	**0.130**

AP-42, Ch 3.4 (10/96) EMISSION FACTORS (diesel fueled, uncontrolled)

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM10
Emission Factor (lb/MMBtu)	3.2	0.09		0.85	0.13
Emission Factor (g/kW-hr))	13.63	0.38		3.62	0.55

Note: Rating for AP-42 PM10 EF of 0.0573 is "E" or Poor. Used Tier 1 PM EF and presumed PM = PM10

40 CFR 89, EPA CERTIFIED GENERATOR EMISSION FACTORS (g/kW-hr converted to lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM = PM10
130 ≤ kW ≤ 560	BlueSky	0	n/a	---	*0.31*	0.94	*0.82*	0.028
225 ≤ kW < 450	1	0	1996	2.16	0.31	---	2.68	0.13
225 ≤ kW < 450	2	0	2001	---	*0.31*	1.50	0.82	0.05
225 ≤ kW < 450	3	0	2006	---	*0.31*	0.94	0.82	0.05
225 ≤ kW < 450	4	0	2011	0.47	0.04	---	0.82	0.05
225 ≤ kW < 450	4	0	2014	0.47	0.04		0.82	0.05
450 ≤ kW ≤ 560	1	0	1996	2.16	0.31	---	2.68	0.13
450 ≤ kW ≤ 560	2	0	2002	---	*0.31*	1.50	0.82	0.05
450 ≤ kW ≤ 560	3	0	2006	---	*0.31*	0.94	0.82	0.05
450 ≤ kW ≤ 560	4	0	2011	0.47	0.04	---	0.82	0.005
450 ≤ kW ≤ 560	4	0	2014	0.47	0.04	---	0.82	0.005
kW > 560	1	0	2000	2.16	0.31	---	2.68	0.13
kW > 560	2	0	2006	---	*0.31*	1.50	0.82	0.05
kW > 560	4	0	2011	0.82	0.04	---	0.82	0.01
kW > 560*	4	0	2014	0.16	0.04	---	0.82	0.01
kW > 560	BlueSky	0	n/a	---	*0.31*	0.89	*0.82*	0.028

*Tier 4 final emission factors from 40 CFR 1039.101 for engines that are part of gensets

40 CFR 89, EPA CERTIFIED GENERATOR EMISSION FACTORS FOR GENERATOR G2 (lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM10
130 ≤ kW ≤ 560	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	1	0	1996	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	2	0	2001	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	3	0	2006	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	4	0	2011	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	4	0	2014	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	1	0	1996	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	2	0	2002	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	3	0	2006	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	4	0	2011	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	4	0	2014	0.00	0.00	0.00	0.00	0.00
kW > 560	1	0	2000	0.00	0.00	0.00	0.00	0.00
kW > 560	2	0	2006	0.00	0.00	0.00	0.00	0.00
kW > 560	4	0	2011	0.00	0.00	0.00	0.00	0.00
kW > 560	4	0	2015	0.00	0.00	0.00	0.00	0.00
kW > 560	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00

EMISSION FACTORS FOR GENERATOR G2 (lb/MMBTU):	**0.00**	**0.00**	**0.00**	**0.00**	**0.000**

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

IC Engine 2 Powering an Electrical Generator > 600 hp (447 kW) AP-42 Section 3.4 (diesel fueled, uncontrolled)

Fuel Type Toggle = 0 866 kw User Input Weight % Sulfur = 0.0500%
Fuel Consumption Rate 59.31 gal/hr AP-42 3.4-1 SO2 EF = 1.01 x S
Calculated MMBtu/hr 8.13 MMBtu/hr
Max Daily Operation 12 hr/day Not an EPA-Certified Generator
Max Annual Operation 4,380 hrs/yr

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM [b]	0.1	0.000	0.00E+00	0.00E+00
PM-10 (total) [d]	0.13	0.000	0.00E+00	0.00E+00
PM-2.5	0.0556	0.000	0.00E+00	0.00E+00
CO [b]	0.85	0.000	0.00E+00	
NOx[b]	3.20	0.000	0.00E+00	0.00E+00
SO_2 [b] (total SOx presumed SO2)	0.0505	0.000	0.000	0.00E+00
VOC [b] (total TOC--> VOCs)	0.09	0.000	0.000	
Lead				
HCl [e]				
Dioxins[e]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD[c]				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD[c]				
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD[c]				
Total $HpCDD_c$				
Octa CDD[c]				
Total PCDD[c]				
Furans[e]				
2,3,7,8-TCDF				
Total TCDF[c]				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF[c]				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF[c]				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF[c]				
Octa CDF[c]				
Total PCDF[c]				
Total PCDD/PCDF[c]				
Non-PAH HAPs				
Acetaldehyde[c]	2.52E-05	0.00E+00	0.00E+00	**0.00E+00**
Acrolein[c]	7.88E-06	0.00E+00	0.00E+00	0.00E+00
Benzene[c,e]	7.76E-04	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[c,e]				
Ethylbenzene[e]				
Formaldehyde[c,e]	7.89E-05	0.00E+00	0.00E+00	**0.00E+00**
Hexane[e]				
Isooctane				
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]				
Toluene[c,e]	2.81E-04	0.00E+00	0.00E+00	0.00E+00
Xylene[c,e]	1.93E-04	0.00E+00	0.00E+00	0.00E+00
POM (7-PAH Group)		0.00E+00		**0.00E+00**

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr
PAH HAPs				
2-Methylnaphthalene				
3-Methylchloranthrene[e]				
Acenaphthene[c1]	4.68E-06	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthylene[c1]	9.23E-06	0.00E+00	0.00E+00	**0.00E+00**
Anthracene[c1]	1.23E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene[c1]	6.22E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)pyrene[c1,e]	2.57E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(b)fluoranthene[c1]	1.11E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene				
Benzo(g,h,I)perylene[c1]	5.56E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(k)fluoranthene[c1]	2.18E-07	0.00E+00	0.00E+00	**0.00E+00**
Chrysene[c1]	1.53E-06	0.00E+00	0.00E+00	**0.00E+00**
Dibenzo(a,h)anthracene[c1]	3.46E-07	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene				
Fluoranthene[c1]	4.03E-06	0.00E+00	0.00E+00	**0.00E+00**
Fluorene[c1]	1.28E-05	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene[c1]	4.14E-07	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[c1,e]	1.30E-04	0.00E+00	0.00E+00	**0.00E+00**
Perylene				
Phenanthrene[c1]	4.08E-05	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[c1]	3.71E-06	0.00E+00	0.00E+00	**0.00E+00**
Non-HAP Organic Compounds				
Acetone[e]				
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[e]				
Arsenic[e]				
Barium[e]				
Beryllium[e]				
Cadmium[e]				
Chromium[e]				
Cobalt[e]				
Copper[e]				
Hexavalent Chromium[e]				
Manganese[e]				
Mercury[e]				
Molybdenum[e]				
Nickel[e]				
Phosphorus[e]				
Silver[e]				
Selenium[e]				
Thallium[e]				
Vanadium[e]				
Zinc[e]				

a) Emission factors are from AP-42
b) AP-42, Table 3.4-1, Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual Fuel Engines, 10/96
c) AP-42, Table 3.4-3, Speciated Organic Compound Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
c1) AP-42, Table 3.4-4, PAH Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
d) AP-42, Table 3.4-2, Particulate and Particle-Sizing Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**
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Max Hourly Production	400	T/hr	96% T/hr is Aggregate & RAP =	**384 T/hr**
Max Daily Production	4,000	Tons/day	96% T/day is Aggregate & RAP =	**3,840 T/day**
Max Annual Production	1,000,000	Tons/yr	96% T/yr is Aggregate & RAP =	**960,000 T/yr**

Fine PM emitted from RAP use is negligible (see assumptions on page 1 of this spreadsheet). Worst case emissions are for 0% RAP

Aggregate Front-end Loader Drop Points, AP-42 13.2.4 (11/06)

$E = k\ (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$ = 3.31E-03 for PM 1.56E-03 lb/ton for PM10 2.37E-04 lb/ton for PM2.5

k = particle size multiplier	0.74 for PM	0.35 for PM10	0.053 for PM2.5	
U = mean wind speed =	**10 mph**	Wind speed range for source conditions for Equation 1: 1.3 to 15 mph. Select 10 mph as base case wind speed.		
M = moisture content =	**3 %**			

Moisture Content: STAPPA-ALAPCO-EPA, Emission Inventory Improvement Program, Volume II, Chapter 3, Preferred and Alternative Methods for Estimating Air Emissions from Hot Mix Asphalt Plants, Final Report, July 1996: Aggregate moisture content into dryer typically 3 to 7 %
BAAQMD, Hot Mixing Asphalt Facilities, Engineering Evaluation Template, www.baaqmd.gov/pmt/handbook/s11c02ev.htm: Bulk aggregate moisture content typically stabiliizes between 3 and 5% by weight.

Windspeed Variation Factors for AERMOD modeling:				PM10		PM2.5	
Wind Category	Upper windspeed (m/sec)	Avg windspeed (m/sec)	Avg windspeed (mph)	E @ avg mph	F = Eavg mph/ E@10mph	E @ avg mph	F = Eavg mph/ E@10mph
Cat 1:	1.54	0.77	1.72	1.59E-04	0.1016	2.41E-05	0.1016
Cat 2:	3.09	2.32	5.18	6.65E-04	0.4251	1.01E-04	0.4251
Cat 3:	5.14	4.12	9.20	1.40E-03	0.8979	2.13E-04	0.8979
Cat 4:	8.23	6.69	14.95	2.64E-03	1.687	3.99E-04	1.687
Cat 5:	10.80	9.52	21.28	4.17E-03	2.670	6.32E-04	2.670
Cat 6:	14.00	12.40	27.74	5.89E-03	3.767	8.92E-04	3.767

Aggregate Front End Loader Drop Points

Drop to storage pile and drop to bins: **384 T/hr** **2** Transfer Points

Pollutant	Calculated Emission Factor from AP-42 13.2.4 (lb/ton)	Emissions Per Transfer Point				Total Emissions			
		Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average	Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average
PM (total)	3.31E-03	1.27	0.53	1.59	0.48	2.54	1.06	3.17	0.96
PM-10 (total)	1.56E-03	0.60	0.25	0.75	0.23	1.20	0.50	1.50	0.45
PM-2.5	2.37E-04	0.09	0.04	0.11	0.03	0.18	0.08	0.23	0.07

Conveyor and Scalping Screen Emission Points

Moisture/Control %:
AP-42 Table 11.19.2-2, Note b. Moisture content of uncontrolled sources ranged from 0.21 to 1.3%
AP-42 Table 11.19.2-2, Note b. Moisture content of controlled (water spray) sources ranged from 0.55 to 2.88% --> ~91.3% control for screening, ~95% control for conveyor transfer
Bulk aggregate for HMA plants typically stabilizes between 3 and 5% by weight--> Apply additional **90%** control to lb/hr, etc. for the higher moisture.

Aggregate Weigh Conveyor

Transfer from bins to conveyor and from conveyor to scalping screen: **384 T/hr** **2** Transfer Points

Pollutant	Calculated Emission Factor from AP-42 13.2.4 (lb/ton)	Emissions Per Transfer Point				Total Emissions			
		Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average	Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average
PM (total)	3.31E-03	1.27E-01	5.29E-02	1.59E-01	4.81E-02	2.54E-01	1.06E-01	3.17E-01	9.62E-02
PM-10 (total)	1.56E-03	6.00E-02	2.50E-02	7.50E-02	2.27E-02	1.20E-01	5.00E-02	1.50E-01	4.55E-02
PM-2.5	2.37E-04	9.09E-03	3.79E-03	1.14E-02	3.44E-03	1.82E-02	7.58E-03	2.27E-02	6.89E-03

Aggregate Scalping Screen, AP-42 11.19 (8/04)

Aggregate flow across scalping screen onto conveyor: **384 T/hr**

Pollutant	Emission Factor Table 11.19.2-2 SCREENING UNCONTROLLED (lb/ton)	Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average
PM (total)	0.025	0.960	4.00E-01	1.20E+00	3.64E-01
PM-10 (total)	0.0087	0.334	1.39E-01	4.18E-01	1.27E-01
PM-2.5	1.30E-04	0.005	2.08E-03	6.24E-03	1.89E-03

Aggregate Conveyor to Drum (~top end of the drum)

Aggregate transfer from conveyor to drum dryer (1 transfer point): **384 T/hr**

Pollutant	Calculated Emission Factor from AP-42 13.2.4 (lb/ton)	Emissions Per Transfer Point					
		Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average		
PM (total)	3.31E-03	1.27E-01	5.29E-02	1.59E-01	4.81E-02		
PM-10 (total)	1.56E-03	6.00E-02	2.50E-02	7.50E-02	2.27E-02	5.75E-01	Total Conveyor Drop
PM-2.5	2.37E-04	9.09E-03	3.79E-03	1.14E-02	3.44E-03	8.71E-02	Total Conveyor Drop

Scalping Scrn & Transfer Points

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

Asphalt Tank Heater - #2 Oil Fired, Estimated GHG Emissions Using AP-42 Sections 11.1 (HMA Plants) & 1.3 (Fuel Oil Combustion)

Hot Mix Plant Fuel Type Toggle (#2) =	1
Hot Mix Plant Fuel Type Toggle (Used Oil) =	1
Hot Mix Plant Fuel Type Toggle (NG) =	1
Hot Mix Plant Fuel Type Toggle (LPG) =	1
Tank Heater Fuel Type Toggle (NG) =	0
Tank Heater Fuel Type Toggle (#2) =	0

Note: CO2e emissions from the silo, loadout operation, and the tanks were assumed to be negligible (less than 1 ton per year).

Green House Gas Emissions When Combusting #2 Fuel Oil

Asphalt Plant Emissions	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	33.00	lb/T	AP-42 Table 11.1-7	16,500.00	1.00	16,500.00
Methane	0.012	lb/T	AP-42 Table 11.1-8	6.00	21.00	126.00
N_2O	0.26	lb/10^3 gal	AP-42 Table 1.3-8	0.208713	310.00	64.70

Tank Heater	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e T/yr
CO_2	Assumes all carbon is converted to CO_2.			0.00	1	0.00
Methane	0.216	lb/10^3 gal	AP-42 Table 1.3-3	0.00E+00	21	0.00
N_2O	0.26	lb/10^3 gal	AP-42 Table 1.3-8	0.00E+00	310	0.00

Green House Gas Emissions When Combusting Used Oil

Asphalt Plant Emissions	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	33.00	lb/T	AP-42 Table 11.1-7	16,500.00	1.00	16,500.00
Methane	0.012	lb/T	AP-42 Table 11.1-8	6.00	21.00	126.00
N_2O	0.53	lb/10^3 gal	AP-42 Table 1.3-8	0.425454	310.00	131.89

Green House Gas Emissions When Combusting Natural Gas

Asphalt Plant Emissions	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	33.00	lb/T	AP-42 Table 11.1-7	16,500.00	1.00	16,500.00
Methane	0.012	lb/T	AP-42 Table 11.1-8	6.00	21.00	126.00
N_2O	0.26	lb/10^3 gal	AP-42 Table 1.3-8	0.208713	310.00	64.70

Tank Heater	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e T/yr
CO_2	0.12	lb/scf	AP-42 Table 1.4-2	0.00	1	0.00
Methane	0.0000023	lb/scf	AP-42 Table 1.4-2	0.00E+00	21	0.00
N_2O	0.0000022	lb/scf	AP-42 Table 1.4-2	0.00E+00	310	0.00

Green House Gas Emissions When Combusting LPG

Asphalt Plant Emissions	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	33.00	lb/T	AP-42 Table 11.1-7	16,500.00	1.00	16,500.00
Methane	0.012	lb/T	AP-42 Table 11.1-8	6.00	21.00	126.00
N_2O	0.26	lb/10^3 gal	AP-42 Table 1.3-8	0.208713	310.00	64.70

Green House Gas Emissions When Combusting Diesel Fuel

IC Engine 1 < 600 bhp	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	1.16	lb/bhp-hr	AP-42 Table 3.4-1	0.00	1.00	0.00

IC Engine 2 > 600 bhp	Emission Factor (EF)	EF Units	EF Source	Emissions (T/yr)	Global Warming Potential	CO_2e (T/yr)
CO_2	1.16	lb/bhp-hr	AP-42 Table 3.4-1	0.00	1.00	0.00

Total Green House Gas Emissions

Total Emissions	CO_2e (T/yr)
CO_2	16,500.00
Methane	126.00
N_2O	131.89
Grand Total	**16,757.89**

Facility: **Interstate Concrete & Asphalt - 00617**
6/7/2021 9:28 **Permit/Facility ID:** **0**

EMISSION INVENTORY

POUNDS PER HOUR

Max Controlled Emissions of Any Pollutant from Drum Mix HMA Plant Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day
Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected = #2 Fuel Oil Used Oil Natural Gas LPG/Propane
B. Tank Heater: **10.0000** MMBtu/hr **4,000** Hours/year **24** hrs/day
Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =
C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine < 600hp #2 Fuel Oil **0** hrs/day
C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp #2 Fuel Oil **0** hrs/day

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B Asphalt Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C IC Engine 1 + IC Engine 2** Max Emission Rate for Pollutant (lb/hr)	**D Load-out & Silo Filling** Emission Rate for Pollutant (lb/hr)	**E TOTAL** of Max Emission Rates from A, B, C & D (lb/hr)
PM (total)	13.20	0.00E+00	0.00E+00	2.09E-01	13.41
PM-10 (total)	9.20	0.00E+00	0.00E+00	2.09E-01	9.41
PM-2.5	8.92	0.00E+00	0.00E+00	2.09E-01	9.13
CO	52.00	0.00E+00	0.00E+00	1.01E+00	53.01
NOx	22.00	0.00E+00	0.00E+00		22.00
SO_2	7.12	0.00E+00	0.00E+00		7.12
VOC	12.80	0.00E+00	0.00E+00	1.61E+00	14.41
Lead	6.00E-03	0.00E+00	0.00E+00		6.00E-03
HCl [e]	8.40E-02	0.00E+00	0.00E+00		8.40E-02
Dioxins[e]					
2,3,7,8-TCDD	3.18E-11				**3.18E-11**
Total TCDD	1.41E-10				**1.41E-10**
1,2,3,7,8-PeCDD	4.70E-11				**4.70E-11**
Total PeCDD	3.33E-09				**3.33E-09**
1,2,3,4,7,8-HxCDD	6.36E-11	0.00E+00			**6.36E-11**
1,2,3,6,7,8-HxCDD	1.97E-10				**1.97E-10**
1,2,3,7,8,9-HxCDD	1.48E-10	0.00E+00			**1.48E-10**
Total HxCDD	1.82E-09				**1.82E-09**
1,2,3,4,6,7,8-Hp-CDD	7.27E-10	0.00E+00			**7.27E-10**
Total HpCDD	2.88E-09	0.00E+00			**2.88E-09**
Octa CDD	3.79E-09	0.00E+00			**3.79E-09**
Total PCDD[h]	1.20E-08	0.00E+00			**1.20E-08**
Furans[e]					
2,3,7,8-TCDF	1.47E-10				**1.47E-10**
Total TCDF	5.61E-10	0.00E+00			**5.61E-10**
1,2,3,7,8-PeCDF	6.52E-10				**6.52E-10**
2,3,4,7,8-PeCDF	1.27E-10				**1.27E-10**
Total PeCDF	1.27E-08	0.00E+00			**1.27E-08**
1,2,3,4,7,8-HxCDF	6.06E-10				**6.06E-10**
1,2,3,6,7,8-HxCDF	1.82E-10				**1.82E-10**
2,3,4,6,7,8-HxCDF	2.88E-10				**2.88E-10**
1,2,3,7,8,9-HxCDF	1.27E-09				**1.27E-09**
Total HxCDF	1.97E-09	0.00E+00			**1.97E-09**
1,2,3,4,6,7,8-HpCDF	9.85E-10				**9.85E-10**
1,2,3,4,7,8,9-HpCDF	4.09E-10				**4.09E-10**
Total HpCDF	1.52E-09	0.00E+00			**1.52E-09**
Octa CDF	7.27E-10	0.00E+00			**7.27E-10**
Total PCDF[h]	6.06E-09	0.00E+00			**6.06E-09**
Total PCDD/PCDF[h]	1.82E-08	0.00E+00	0.00E+00		**1.82E-08**
Non-PAH HAPs					
Acetaldehyde[e]	1.97E-01		0.00E+00		**1.97E-01**
Acrolein[e]	4.33E-03		0.00E+00		4.33E-03
Benzene[e]	5.91E-02	0.00E+00	0.00E+00	9.19E-04	**6.00E-02**
1,3-Butadiene[e]			0.00E+00		**0.00E+00**
Ethylbenzene[e]	4.00E-02			2.71E-03	4.27E-02
Formaldehyde[e]	4.70E-01	0.00E+00	0.00E+00	1.33E-02	**4.83E-01**
Hexane[e]	1.53E-01	0.00E+00		3.07E-03	1.56E-01
Isooctane	6.67E-03			1.88E-05	6.69E-03
Methyl Ethyl Ketone[e]	3.33E-03			1.13E-03	4.47E-03
Pentane[e]		0.00E+00			0.00E+00
Propionaldehyde[e]	2.17E-02				2.17E-02
Quinone[e]	2.67E-02				2.67E-02
Methyl chloroform[e]	8.00E-03				8.00E-03
Toluene[e]	4.83E-01	0.00E+00	0.00E+00	2.71E-03	4.86E-01
Xylene[e]	3.33E-02		0.00E+00	1.36E-02	4.69E-02
POM (7-PAH Group)[e]	8.30E-05	0.00E+00	0.00E+00	1.72E-04	**2.55E-04**
TOTAL PAH HAPs	1.34E-01	0.00E+00	0.00E+00	7.45E-03	**1.42E-01**

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B Asphalt Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C IC Engine IC1 + IC2** Max Emission Rate for Pollutant (lb/hr)	**D Load-out & Silo Filling** Emission Rate for Pollutant (lb/hr)	**E TOTAL** of Max Emission Rates from A, B, C & D (lb/hr)
PAH HAPs					
2-Methylnaphthalene	2.58E-02	0.00E+00		3.26E-03	**2.90E-02**
3-Methylchloranthrene[e]	0.00E+00	0.00E+00			**0.00E+00**
Acenaphthene	2.12E-04	0.00E+00	0.00E+00	3.15E-04	**5.27E-04**
Acenaphthylene	3.33E-03	0.00E+00	0.00E+00	1.98E-05	**3.35E-03**
Anthracene	4.70E-04	0.00E+00	0.00E+00	8.62E-05	**5.56E-04**
Benzo(a)anthracene[e]	3.18E-05	0.00E+00	0.00E+00	3.14E-05	**6.32E-05**
Benzo(a)pyrene[e]	1.48E-06	0.00E+00	0.00E+00	1.19E-06	**2.67E-06**
Benzo(b)fluoranthene[e]	1.52E-05	0.00E+00	0.00E+00	3.93E-06	**1.91E-05**
Benzo(e)pyrene	1.67E-05	0.00E+00		7.68E-06	**2.44E-05**
Benzo(g,h,I)perylene	6.06E-06	0.00E+00	0.00E+00	9.81E-07	**7.04E-06**
Benzo(k)fluoranthene[e]	6.21E-06	0.00E+00	0.00E+00	1.14E-06	**7.35E-06**
Chrysene[e]	2.73E-05	0.00E+00	0.00E+00	1.34E-04	**1.61E-04**
Dibenzo(a,h)anthracene[e]	0.00E+00	0.00E+00	0.00E+00	1.91E-07	**1.91E-07**
Dichlorobenzene	0.00E+00	0.00E+00			**0.00E+00**
Fluoranthene	9.24E-05	0.00E+00	0.00E+00	8.35E-05	**1.76E-04**
Fluorene	1.67E-03	0.00E+00	0.00E+00	7.86E-04	**2.45E-03**
Indeno(1,2,3-cd)pyrene[e]	1.06E-06	0.00E+00	0.00E+00	2.43E-07	**1.30E-06**
Naphthalene[e]	9.85E-02	0.00E+00	0.00E+00	1.35E-03	**9.98E-02**
Perylene	1.33E-06	0.00E+00		2.29E-05	**2.42E-05**
Phenanthrene	3.48E-03	0.00E+00	0.00E+00	1.11E-03	**4.60E-03**
Pyrene	4.55E-04	0.00E+00	0.00E+00	2.47E-04	**7.01E-04**
Non-HAP Organic Compounds					
Acetone[e]	1.38E-01	0.00E+00		1.44E-03	1.40E-01
Benzaldehyde	1.83E-02	0.00E+00			1.83E-02
Butane	1.12E-01	0.00E+00			1.12E-01
Butyraldehyde	2.67E-02	0.00E+00			2.67E-02
Crotonaldehyde[e]	1.43E-02	0.00E+00			1.43E-02
Ethylene	1.17E+00	0.00E+00		2.73E-02	1.19E+00
Heptane	1.57E+00	0.00E+00			1.57E+00
Hexanal	1.83E-02	0.00E+00			1.83E-02
Isovaleraldehyde	5.33E-03	0.00E+00			5.33E-03
2-Methyl-1-pentene	6.67E-01	0.00E+00			6.67E-01
2-Methyl-2-butene	9.67E-02	0.00E+00			9.67E-02
3-Methylpentane	3.17E-02	0.00E+00			3.17E-02
1-Pentene	3.67E-01	0.00E+00			3.67E-01
n-Pentane	3.50E-02	0.00E+00			3.50E-02
Valeraldehyde[e]	1.12E-02	0.00E+00			1.12E-02
Metals					
Antimony[e]	3.00E-05	0.00E+00			3.00E-05
Arsenic[e]	8.48E-05	0.00E+00			**8.48E-05**
Barium[e]	9.67E-04	0.00E+00			9.67E-04
Beryllium[e]	0.00E+00	0.00E+00			**0.00E+00**
Cadmium[e]	6.21E-05	0.00E+00			**6.21E-05**
Chromium[e]	9.17E-04	0.00E+00			9.17E-04
Cobalt[e]	4.33E-06	0.00E+00			4.33E-06
Copper[e]	5.17E-04	0.00E+00			5.17E-04
Hexavalent Chromium[e]	6.82E-05	0.00E+00			**6.82E-05**
Manganese[e]	1.28E-03	0.00E+00			1.28E-03
Mercury[e]	4.33E-04	0.00E+00			4.33E-04
Molybdenum[e]	0.00E+00	0.00E+00			0.00E+00
Nickel[e]	9.55E-03	0.00E+00			**9.55E-03**
Phosphorus[e]	4.67E-03	0.00E+00			4.67E-03
Silver[e]	8.00E-05	0.00E+00			8.00E-05
Selenium[e]	5.83E-05	0.00E+00			5.83E-05
Thallium[e]	6.83E-07	0.00E+00			6.83E-07
Vanadium[e]	0.00E+00	0.00E+00			0.00E+00
Zinc[e]	1.02E-02	0.00E+00			1.02E-02

e) IDAPA Toxic Air Pollutant

Criteria Pollutant lb/hr emissions are maximum 1-hr averages
TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.
Pollutants shown in blue text are emitted only when burning Used Oil, but not when burning #2 Fuel Oil or Natural Gas

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

EMISSION INVENTORY

POUNDS PER HOUR

Max Controlled Emissions of Any Pollutant from Drum Mix HMA Plant Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year HMA throughput **4,000** hrs/day

Maximum emission for each pollutant from any fuel-burning option selected. Fuels Selected = #2 Fuel Oil Used Oil Natural Gas LPG/Propane

B. Tank Heater: **10.0000** MMBtu/hr **4,000** Hours/year **24** hrs/day

Maximum emission for each pollutant from any fuel-burning option selected. Fuels Selected =

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year #2 Fuel Oil Generator < 600hp **0** hrs/day

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year #2 Fuel Oil Generator > 600hp **0** hrs/day

Pollutant	**A** **Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B** **Asphalt Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C** **IC Engine** Max Emission Rate for Pollutant (lb/hr)	**D** **Load-out & Silo Filling** Emission Rate for Pollutant (lb/hr)	**E** **TOTAL** of Max Emission Rates from A, B, C & D (lb/hr)
non-PAH HAPs[g]					
Bromomethane[e]				1.66E-04	1.66E-04
2-Butanone (see Methyl Ethyl Ketone)					
Carbon disulfide[e]				4.15E-04	4.15E-04
Chloroethane (Ethyl chloride[e])				8.27E-05	8.27E-05
Chloromethane (Methyl chloride[e])				5.71E-04	5.71E-04
Cumene				7.62E-04	7.62E-04
n-Hexane					
Methylene chloride (Dichloromethane[e])				5.48E-06	5.48E-06
MTBE					
Styrene[e]				1.60E-04	1.60E-04
Tetrachloroethene (Tetrachloroethylene[e])				5.34E-05	5.34E-05
1,1,1-Trichloroethane (Methyl chloroform[e])					
Trichloroethene (Trichloroethylene[e])					
Trichlorofluoromethane				9.01E-06	9.01E-06
m-/p-Xylene[e]				6.90E-03	6.90E-03
o-Xylene[e]				6.70E-03	6.70E-03
Phenol[e,f]				6.71E-04	6.71E-04
Non-HAP Organic Compounds					
Methane				5.73E-01	5.73E-01

e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

EMISSION INVENTORY

TONS PER YEAR

Max Controlled Emissions of Any Pollutant from Drum Mix HMA Plant Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year HMA throughput **4,000** hrs/day

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected = #2 Fuel Oil Used Oil Natural Gas LPG/Propane

B. Tank Heater: **10.0000** MMBtu/hr **4,000** Hours/year **24** hrs/day

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine <600hp #2 Fuel Oil **0** hrs/day

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp #2 Fuel Oil **0** hrs/day

Pollutant	**A** **Drum Mix** Max Emission Rate for Pollutant (T/yr)	**B** **Asphalt Tank Heater** Max Emission Rate for Pollutant (T/yr)	**C** **IC Engine IC1 + IC2** Max Emission Rate for Pollutant (T/yr)	**D** **Load-out & Silo Filling**, Emission Rate for Pollutant (T/yr)	**E POINT SOURCE TOTAL** of Max Emission Rates from A, B, & C (T/yr) Exclude Fugitives (D)
PM (total)	16.50	0.00E+00	0.00E+00	2.61E-01	16.50
PM-10 (total)	11.50	0.00E+00	0.00E+00	2.61E-01	11.50
PM-2.5	11.15	0.00E+00	0.00E+00	2.61E-01	11.15
CO	65.00	0.00E+00	0.00E+00	1.26E+00	65.00
NOx	27.50	0.00E+00	0.00E+00		27.50
SO_2	8.90	0.00E+00	0.00E+00		8.90
VOC	16.00	0.00E+00	0.00E+00	2.02E+00	16.00
Lead	7.50E-03	0.00E+00	0.00E+00		7.50E-03
HCl [e]	1.05E-01	0.00E+00	0.00E+00		1.05E-01
Dioxins[e]					
2,3,7,8-TCDD	1.05E-10				1.05E-10
Total TCDD	4.65E-10				4.65E-10
1,2,3,7,8-PeCDD	1.55E-10				1.55E-10
Total PeCDD	1.10E-08				1.10E-08
1,2,3,4,7,8-HxCDD	2.10E-10	0.00E+00			2.10E-10
1,2,3,6,7,8-HxCDD	6.50E-10				6.50E-10
1,2,3,7,8,9-HxCDD	4.90E-10	0.00E+00			4.90E-10
Total HxCDD	6.00E-09				6.00E-09
1,2,3,4,6,7,8-Hp-CDD	2.40E-09	0.00E+00			2.40E-09
Total HpCDD	9.50E-09	0.00E+00			9.50E-09
Octa CDD	1.25E-08	0.00E+00			1.25E-08
Total PCDD[h]	3.95E-08	0.00E+00			3.95E-08
Furans[e]					
2,3,7,8-TCDF	4.85E-10				4.85E-10
Total TCDF	1.85E-09	0.00E+00			1.85E-09
1,2,3,7,8-PeCDF	2.15E-09				2.15E-09
2,3,4,7,8-PeCDF	4.20E-10				4.20E-10
Total PeCDF	4.20E-08	0.00E+00			4.20E-08
1,2,3,4,7,8-HxCDF	2.00E-09				2.00E-09
1,2,3,6,7,8-HxCDF	6.00E-10				6.00E-10
2,3,4,6,7,8-HxCDF	9.50E-10				9.50E-10
1,2,3,7,8,9-HxCDF	4.20E-09				4.20E-09
Total HxCDF	6.50E-09	0.00E+00			6.50E-09
1,2,3,4,6,7,8-HpCDF	3.25E-09				3.25E-09
1,2,3,4,7,8,9-HpCDF	1.35E-09				1.35E-09
Total HpCDF	5.00E-09	0.00E+00			5.00E-09
Octa CDF	2.40E-09	0.00E+00			2.40E-09
Total PCDF[h]	2.00E-08	0.00E+00			2.00E-08
Total PCDD/PCDF[h]	6.00E-08	0.00E+00			6.00E-08
Non-PAH HAPs					
Acetaldehyde[e]	6.50E-01		0.00E+00		6.50E-01
Acrolein[e]	1.30E-02		0.00E+00		1.30E-02
Benzene[e]	1.95E-01	0.00E+00	0.00E+00	3.03E-03	1.95E-01
1,3-Butadiene[e]	0.00E+00		0.00E+00		0.00E+00
Ethylbenzene[e]	1.20E-01			8.14E-03	1.20E-01
Formaldehyde[e]	1.55E+00	0.00E+00	0.00E+00	4.39E-02	1.55E+00
Hexane[e]	4.60E-01	0.00E+00		9.21E-03	4.60E-01
Isooctane	2.00E-02			5.63E-05	2.00E-02
Methyl Ethyl Ketone[e]	1.00E-02			3.40E-03	1.00E-02
Pentane[e]	0.00E+00	0.00E+00			0.00E+00
Propionaldehyde[e]	6.50E-02				6.50E-02
Quinone[e]	8.00E-02				8.00E-02
Methyl chloroform[e]	2.40E-02				2.40E-02
Toluene[e]	1.45E+00	0.00E+00	0.00E+00	8.14E-03	1.45E+00
Xylene[e]	1.00E-01	0.00E+00	0.00E+00	4.08E-02	1.00E-01
TOTAL Federal HAPs (T/yr)=					**5.37E+00**

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (T/yr)	**B Asphalt Tank Heater** Max Emission Rate for Pollutant (T/yr)	**C** **IC Engine IC1 + IC2** Max Emission Rate for Pollutant (T/yr)	**D** **Load-out & Silo Filling** Emission Rate for Pollutant (T/yr)	**E POINT SOURCE TOTAL** of Max Emission Rates from A, B, & C (T/yr) Exclude Fugitives (D)
PAH HAPs					
2-Methylnaphthalene	8.50E-02	0.00E+00		1.07E-02	8.50E-02
3-Methylchloranthrene[e]	0.00E+00	0.00E+00			0.00E+00
Acenaphthene	7.00E-04	0.00E+00	0.00E+00	1.04E-03	7.00E-04
Acenaphthylene	1.10E-02	0.00E+00	0.00E+00	6.55E-05	1.10E-02
Anthracene	1.55E-03	0.00E+00	0.00E+00	2.84E-04	1.55E-03
Benzo(a)anthracene[e]	1.05E-04	0.00E+00	0.00E+00	1.03E-04	1.05E-04
Benzo(a)pyrene[e]	4.90E-06	0.00E+00	0.00E+00	3.92E-06	4.90E-06
Benzo(b)fluoranthene[e]	5.00E-05	0.00E+00	0.00E+00	1.30E-05	5.00E-05
Benzo(e)pyrene	5.50E-05	0.00E+00		2.54E-05	5.50E-05
Benzo(g,h,I)perylene	2.00E-05	0.00E+00	0.00E+00	3.24E-06	2.00E-05
Benzo(k)fluoranthene[e]	2.05E-05	0.00E+00	0.00E+00	3.75E-06	2.05E-05
Chrysene[e]	9.00E-05	0.00E+00	0.00E+00	4.42E-04	9.00E-05
Dibenzo(a,h)anthracene[e]	0.00E+00	0.00E+00	0.00E+00	6.31E-07	0.00E+00
Dichlorobenzene	0.00E+00	0.00E+00			0.00E+00
Fluoranthene	3.05E-04	0.00E+00	0.00E+00	2.76E-04	3.05E-04
Fluorene	5.50E-03	0.00E+00	0.00E+00	2.59E-03	5.50E-03
Indeno(1,2,3-cd)pyrene[e]	3.50E-06	0.00E+00	0.00E+00	8.01E-07	3.50E-06
Naphthalene[e]	3.25E-01	0.00E+00	0.00E+00	4.44E-03	3.25E-01
Perylene	4.40E-06	0.00E+00		7.56E-05	4.40E-06
Phenanthrene	1.15E-02	0.00E+00	0.00E+00	3.67E-03	1.15E-02
Pyrene	1.50E-03	0.00E+00	0.00E+00	8.14E-04	1.50E-03
Non-HAP Organic Compounds					
Acetone[e]	4.15E-01	0.00E+00		4.32E-03	4.15E-01
Benzaldehyde	5.50E-02	0.00E+00			5.50E-02
Butane	3.35E-01	0.00E+00			3.35E-01
Butyraldehyde	8.00E-02	0.00E+00			8.00E-02
Crotonaldehyde[e]	4.30E-02	0.00E+00			4.30E-02
Ethylene	3.50E+00	0.00E+00		8.18E-02	3.50E+00
Heptane	4.70E+00	0.00E+00			4.70E+00
Hexanal	5.50E-02	0.00E+00			5.50E-02
Isovaleraldehyde	1.60E-02	0.00E+00			1.60E-02
2-Methyl-1-pentene	2.00E+00	0.00E+00			2.00E+00
2-Methyl-2-butene	2.90E-01	0.00E+00			2.90E-01
3-Methylpentane	9.50E-02	0.00E+00			9.50E-02
1-Pentene	1.10E+00	0.00E+00			1.10E+00
n-Pentane[e]	1.05E-01	0.00E+00			1.05E-01
Valeraldehyde[e]	3.35E-02	0.00E+00			3.35E-02
Metals					
Antimony[e]	9.00E-05	0.00E+00			9.00E-05
Arsenic[e]	2.80E-04	0.00E+00			2.80E-04
Barium[e]	2.90E-03	0.00E+00			2.90E-03
Beryllium[e]	0.00E+00	0.00E+00			0.00E+00
Cadmium[e]	2.05E-04	0.00E+00			2.05E-04
Chromium[e]	2.75E-03	0.00E+00			2.75E-03
Cobalt[e]	1.30E-05	0.00E+00			1.30E-05
Copper[e]	1.55E-03	0.00E+00			1.55E-03
Hexavalent Chromium[e]	2.25E-04	0.00E+00			2.25E-04
Manganese[e]	3.85E-03	0.00E+00			3.85E-03
Mercury[e]	1.30E-03	0.00E+00			1.30E-03
Molybdenum[e]	0.00E+00	0.00E+00			0.00E+00
Nickel[e]	3.15E-02	0.00E+00			3.15E-02
Phosphorus[e]	1.40E-02	0.00E+00			1.40E-02
Silver[e]	2.40E-04	0.00E+00			2.40E-04
Selenium[e]	1.75E-04	0.00E+00			1.75E-04
Thallium[e]	2.05E-06				2.05E-06
Vanadium[e]	0.00E+00	0.00E+00			0.00E+00
Zinc[e]	3.05E-02	0.00E+00			3.05E-02

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

EMISSION INVENTORY

TONS PER YEAR

Max Controlled Emissions of Any Pollutant from Drum Mix HMA Plant Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day

Maximum emission for each pollutant from any fuel-burning option selected. Fuels Selected = #2 Fuel Oil Used Oil Natural Gas LPG/Propane

B. Tank Heater: **10.0000** MMBtu/hr **4,000** Hours/year **24** hrs/day

Maximum emission for each pollutant from any fuel-burning option selected. Fuels Selected =

C1. Generator G1: **0.00** gal/hour **0** Hours/year No Generator #2 Fuel Oil IC Engine <600hp **0** hrs/day

C2. Generator G2: **0.00** gal/hour **0** Hours/year #2 Fuel Oil IC Engine > 600hp **0** hrs/day

Pollutant	**A** **Drum Mix** Max Emission Rate for Pollutant (T/yr)	**B** **Asphalt Tank Heater** Max Emission Rate for Pollutant (T/yr)	**C Generator** Max Emission Rate for Pollutant (T/yr)	**D Load-out, Silo Filling, & Tank Storage** Emission Rate for Pollutant (T/yr)	**E POINT SOURCE TOTAL** of Max Emission Rates from A, B, & C (T/yr) Exclude Fugitives (D)
non-PAH HAPs[g]					
Bromomethane[e]				4.98E-04	0.00E+00
2-Butanone (see Methyl Ethyl Ketone)					0.00E+00
Carbon disulfide[e]				1.25E-03	0.00E+00
Chloroethane (Ethyl chloride[e])				2.48E-04	0.00E+00
Chloromethane (Methyl chloride[e])				1.71E-03	0.00E+00
Cumene				2.29E-03	0.00E+00
n-Hexane				0.00E+00	0.00E+00
Methylene chloride (Dichloromethane[e])				1.65E-05	0.00E+00
MTBE					0.00E+00
Styrene[e]				4.81E-04	0.00E+00
Tetrachloroethene (Tetrachloroethylene[e])				1.60E-04	0.00E+00
1,1,1-Trichloroethane (Methyl chloroform[e])				0.00E+00	0.00E+00
Trichloroethene (Trichloroethylene[e])				0.00E+00	0.00E+00
Trichlorofluoromethane				2.70E-05	0.00E+00
m-/p-Xylene[e]				2.07E-02	0.00E+00
o-Xylene[e]				2.01E-02	0.00E+00
Phenol[e,f]				2.01E-03	0.00E+00
Non-HAP Organic Compounds					
Methane				1.72E+00	0.00E+00

e) IDAPA Toxic Air Pollutant

Facility: Interstate Concrete & Asphalt - 00617

6/7/2021 10:03 Permit/Facility ID: 0 0

TAPs EL Screen - ALL SOURC

586 pollutants are shown in bold

Facility: Interstate Concrete & Asphalt - 00617

6/7/2021 10:03 Permit/Facility ID: 0 0

TAPs EL Screen - ALL SOURC

Max Emissions of Any Pollutant from Drum Mix HMA Plant Fabric Filter, Tank Heater, Silo Fill/Load-out - Generator not included

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day

Maximum emission for each pollutant from any fuel-burning option selected on "Facility Data" worksheet

B. Tank Heater: **10.0000** MMBtu Rated **4,000** Hours/year **D. Include all emissions from Load-out/Silo Filling? Yes**

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet Short Term Source Factor 586 ELs? 10

C1. IC Engine G1: **0.00** gal/hour **0** Hours/year IC Engine <600hp #2 Fuel Oil **0** hrs/day

C2. IC Engine G2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp #2 Fuel Oil **0** hrs/day

Pollutant	TOTAL of Max Emission Rates from A, B, & D (lb/hr)	TAPs Screening Emission Limit (EL) Increment[a] (lb/hr)	TAPs Emissions Exceed EL Increment?	Modeled? Meets AAC or AACC?
HCl [e]	0.084	0.05	Exceeds	
Dioxins		Toxic Equivalency Factor[f]	Adjusted Emissi Rate (lb/hr)	
2,3,7,8-TCDD	3.18E-11	1.0	3.18E-11	
Total TCDD	1.41E-10	n/a		
1,2,3,7,8-PeCDD	4.70E-11	1.0	4.70E-11	
Total PeCDD	3.33E-09	n/a		
1,2,3,4,7,8-HxCDD	6.36E-11	0.1	6.36E-12	
1,2,3,6,7,8-HxCDD	1.97E-10	0.1	1.97E-11	
1,2,3,7,8,9-HxCDD	1.48E-10	0.1	1.48E-11	
Total HxCDD	1.82E-09	n/a		
1,2,3,4,6,7,8-Hp-CDD	7.27E-10	0.01	7.27E-12	
Total HpCDD	2.88E-09	n/a		
Octa CDD	3.79E-09	0.0003	1.14E-12	
Total PCDD	1.20E-08	n/a		

Pollutant	TOTAL of Max Emission Rates from A, B, & D (lb/hr)	TAPs Screening Emission Limit (EL) Increment[a] (lb/hr)	TAPs Emissions Exceed EL Increment?	Modeled? Meets AAC or AACC?
PAH HAPs				
2-Methylnaphthalene	2.90E-02	9.10E-05	Exceeds	
3-Methylchloranthrene	0.00E+00	2.50E-06	No	
Acenaphthene	5.27E-04	9.10E-05	Exceeds	
Acenaphthylene	3.35E-03	9.10E-05	Exceeds	
Anthracene	5.56E-04	9.10E-05	Exceeds	
Benzo(a)anthracene	6.32E-05			see POM
Benzo(a)pyrene	2.67E-06	2.00E-05	No	see POM
Benzo(b)fluoranthene	1.91E-05			see POM
Benzo(e)pyrene	2.44E-05	9.10E-05	No	
Benzo(g,h,i)perylene	7.04E-06	9.10E-05	No	
Benzo(k)fluoranthene	7.35E-06			see POM
Chrysene	1.61E-04			see POM
Dibenzo(a,h)anthracene	1.91E-07			see POM
Dichlorobenzene	0.00E+00	9.10E-05	No	
Fluoranthene	1.76E-04	9.10E-05	Exceeds	
Fluorene	2.45E-03	9.10E-05	Exceeds	
Indeno(1,2,3-cd)pyrene	1.30E-06			see POM
Naphthalene[g]	9.98E-02	9.10E-05	Exceeds	
Perylene	2.42E-05	9.10E-05	No	
Phenanthrene	4.60E-03	9.10E-05	Exceeds	
Pyrene	7.01E-04	9.10E-05	Exceeds	

Pollutant	TOTAL of Max Emission Rates from A, B, & D (lb/hr)	TAPs Screening Emission Limit (EL) Increment[a] (lb/hr)	TAPs Emissions Exceed EL Increment?	Modeled?
non-PAH HAPs[g]				
Bromomethane (Methyl bromide)[g]	1.66E-04	1.27	No	
2-Butanone (see Methyl Ethyl Ketone)				
Carbon disulfide[g]	4.15E-04	2	No	
Chloroethane (Ethyl chloride)[g]	8.27E-05	176	No	
Chloromethane (Methyl chloride)[g]	5.71E-04	6.867	No	
Cumene[g]	7.62E-04	16.3	No	
n-Hexane[g] (see Hexane[g])				
Methylene chloride (Dichloromethane)[g]	5.48E-06	1.60E-03	No	
MTBE	0.00E+00			
Styrene[g]	1.60E-04	6.67	No	
Tetrachloroethene (Tetrachloroethylene)[g]	5.34E-05	1.30E-02	No	
1,1,1-Trichloroethane (see Methyl chloroform)				
Trichloroethene (Trichloroethylene)[g]	0.00E+00	17.93	No	
Trichlorofluoromethane	9.01E-06			
m-/p-Xylene[g] (added into Xylene[g])				
o-Xylene[g] (added into Xylene[g])				
Phenol[g,i]	6.71E-04	1.27	No	

Furans				
2,3,7,8-TCDF	1.47E-10	0.1	1.47E-11	
Total TCDF	5.61E-10	n/a		
1,2,3,7,8-PeCDF	6.52E-10	0.03	1.95E-11	
2,3,4,7,8-PeCDF	1.27E-10	0.3	3.82E-11	
Total PeCDF	1.27E-08	n/a		
1,2,3,4,7,8-HxCDF	6.06E-10	0.1	6.06E-11	
1,2,3,6,7,8-HxCDF	1.82E-10	0.1	1.82E-11	
2,3,4,6,7,8-HxCDF	2.88E-10	0.1	2.88E-11	
1,2,3,7,8,9-HxCDF	1.27E-09	0.1	1.27E-10	
Total HxCDF	1.97E-09	n/a		
1,2,3,4,6,7,8-HpCDF	9.85E-10	0.01	9.85E-12	
1,2,3,4,7,8,9-HpCDF	4.09E-10	0.01	4.09E-12	
Total HpCDF	1.52E-09	n/a		
Octa CDF	7.27E-10	0.0003	2.18E-13	
Total PCDF	6.06E-09	n/a		
Total PCDD/PCDF	1.82E-08	n/a		

	Adjusted lb/hr	TAPs EL for 2,3,7,8 TCDD	Exceeds TAPs EL?	Modeled?
TOTAL Dioxin/Furans	4.50E-10	1.50E-09	No	

Non-PAH HAPs				
Acetaldehyde	1.97E-01	3.00E-03	Exceeds	
Acrolein	4.33E-03	0.017	No	
Benzene	6.00E-02	8.00E-03	Exceeds	
1,3-Butadiene				
Ethylbenzene	4.27E-02	29	No	
Formaldehyde	4.83E-01	5.10E-03	Exceeds	
Hexane	1.56E-01	12	No	
Isooctane	6.69E-03			
Methyl Ethyl Ketone	4.47E-03	39.3	No	
Pentane	0.00E+00	118	No	
Propionaldehyde	2.17E-02	0.0287	No	
Quinone	2.67E-02	0.027	No	
Methyl chloroform	8.00E-03	127	No	
Toluene	4.86E-01	25	No	
Xylene	4.69E-02	29	No	

PolycyclicOrganicMatter[d]	2.55E-04	2.00E-05	Exceeds	
Non-HAP Organic Compounds				
Acetone	1.40E-01	119	No	
Benzaldehyde	1.83E-02			
Butane	1.12E-01			
Butyraldehyde	2.67E-02			
Crotonaldehyde	1.43E-02	0.38	No	
Ethylene	1.19E+00			
Heptane	1.57E+00	109	No	
Hexanal	1.83E-02			
Isovaleraldehyde	5.33E-03			
2-Methyl-1-pentene	6.67E-01			
2-Methyl-2-butene	9.67E-02			
3-Methylpentane	3.17E-02			
1-Pentene	3.67E-01			
n-Pentane[e]	3.50E-02	118	No	
Valeraldehyde (n-Valeraldehyde)	1.12E-02	11.7	No	
Metals				
Antimony[e]	3.00E-05	0.033	No	
Arsenic	8.48E-05	1.50E-05	Exceeds	
Barium	9.67E-04	0.033	No	
Beryllium	0.00E+00	2.80E-05	No	
Cadmium	6.21E-05	3.70E-05	Exceeds	
Chromium	9.17E-04	0.033	No	
Cobalt	4.33E-06	0.0033	No	
Copper	5.17E-04	0.067	No	
Hexavalent Chromium	6.82E-05	5.60E-06	Exceeds	
Manganese	1.28E-03	0.333	No	
Mercury	4.33E-04	0.003	No	
Molybdenum	0.00E+00	0.333	No	
Nickel	9.55E-03	2.70E-04	Exceeds	
Phosphorus	4.67E-03	0.007	No	
Silver	8.00E-05	0.007	No	
Selenium	5.83E-05	0.013	No	
Thallium	6.83E-07	0.007	No	
Vanadium	0.00E+00	0.003	No	
Zinc	1.02E-02	0.667	No	

Non-HAP Organic Compounds				
Methane	5.73E-01			

a) For HMA facilities subject to NSPS (40 CFR 60, Subpart I), PTE includes fugitive emissions of PM from load-out, silo filling & storage tank operations.

e) IDAPA Toxic Air Pollutant, 58.01.01.585 or .586

a) Reserved.

b) Toxic Air Pollutants, IDAPA 58.01.01.585 and .586, levels in effect as of February 25, 2009

c) 2005, Van den Berg, et al, The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-Like Compounds, *Toxicological Sciences* 93(2), 223-241 (2006). Accessible at http://toxsci.oxfordjournals.org/cgi/reprint/93/2/223.

Use of the 2005 WHO toxic equivalency factors (TEFs) is consistent with current EPA recommendations for TRI reporting (72 FR 26544, May 10, 2007)

n/a = not available. IDAPA 58.01.01.586, TAPs Carcinogenic Increments: Total of adjusted emission rates are treated as a single TAP (2,3,7,8 TCDD)

d) IDAPA 58.01.01.586, Polycyclic Organic Matter: Emissions of highlighted PAHs h shall be considered together as one TAP equivalent in potency to benzo(a)pyrene.

e) Naphthalene is listed as a noncarcinogenic TAP in IDAPA 58.01.01.585 (EL = 3.33 lb/hr), but must also be considered as a carcinogenic PAH (EL = 9.10E-05 lb/hr)

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Pollutants shown in blue text are emitted only when burning Used Oil, but not when burning #2 Fuel Oil or Natural Gas

TAPs from the IC engines are not included in this summary. They are regulated by a NESHAP/NSPS and not to be inculded in the TAPs analysis

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0**

1. Criteria Pollutant NAAQS Compliance Demonstration Applicability

Criteria Pollutant	BRC Level (tpy)	Applicable Facility Wide PTE Emissions (tpy)	Air Impact Analyses Required?
PM_{10}	1.5	11.50	Yes
$PM_{2.5}$	1.0	11.15	Yes
Carbon Monoxide (CO)	10	65.00	Yes
Sulfur Dioxide (SO_2)	4.0	8.90	Yes
Nitrogen Oxides (NO_X)	4.0	27.50	Yes
Lead (Pb)	0.06	7.50E-03	No
Ozone (as VOC)	4.0	7.50E-03	No

2. Emission Comparisons to Modeling Thresholds

Pollutant / Averaging Period	Emission Rate	Level I Threshold	Level II Threshold	Air Impact Analyses Required?
PM_{10} 24-hr	9.4	0.22 lb/hr	2.6 lb/hr	Yes
$PM_{2.5}$ 24-hr	9.1	0.054 lb/hr	0.63 lb/hr	Yes
$PM_{2.5}$ annual	11.2	0.35 tpy	4.1 tpy	Yes
CO 1-hr, 8-hr	53	15 lb/hr	175 lb/hr	No[1]
SO_2 1-hr	7	0.21 lb/hr	2.5 lb/hr	Yes
SO_2 annual	8.9	1.2 tpy	14 tpy	No[1]
NO_X 1-hr	22.0	0.20 lb/hr	2.4 lb/hr	Yes
NO_X annual	27.5	1.2 ton/yr	14 ton/yr	Yes

1. Level II thresholds are appropriate for this pollutant . Emissions will achieve good dispersion from the high volume of hot exhaust from the drum dryer. There emissions are also distrubuted amoung different sources rather than a single, concentrated point.

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

CRITERIA POLLUTANT MODELING

POUNDS PER HOUR - POINT AND PSEUDO-STACK SOURCES

Maximum Controlled Emissions of Any Pollutant from Drum Mix HMA Plant with Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day 10. hr/day 2,500 hr/yr

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected =

#2 Fuel Oil 0.0500% S	Used Oil 0.1000% S	Natural Gas	LPG/Propane
		24 hrs/day	

B. Tank Heater: **10.0000** MMBtu Rate **4,000** Hours/year

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

0.5000% S		

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine < 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

Max 1-hour, 3-hour, and 8-hour averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B Asphaltic Oil Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C1 IC1< 600 bhp Generator** Max Emission Rate for Pollutant (lb/hr)	**C2 IC2 > 600 bhp Generator** Max Emission Rate for Pollutant (lb/hr)	**D1 Silo Filling** Emission Rate for Pollutant (lb/hr)	**D2 Load-out** Emission Rate for Pollutant (lb/hr)	**Load Conveyor** Emission Rate for Pollutant (lb/hr)	**Screen** Emission Rate for Pollutant (lb/hr)
NO_X 1-hr	22.00	0	0.00	0.0	--	--	--	--
SO_2 1-hr, 3-hr	7.12	0	0.00E+00	0.00	--	--	--	--

Max 24-hour averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B Asphalt Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C1 G1 < 600 hp Generator** Max Emission Rate for Pollutant (lb/hr)	**C2 G2 > 600hp Generator** Max Emission Rate for Pollutant (lb/hr)	**D1 Silo Filling** Emission Rate for Pollutant (lb/hr)	**D2 Load-out** Emission Rate for Pollutant (lb/hr)	**Load Conveyor** Emission Rate for Pollutant (lb/hr)	**Screen** Emission Rate for Pollutant (lb/hr)
PM-10 (total)	3.83	0	0.000	0.000	9.76E-05	8.70E-02	0.575	0.139
PM-2.5	3.72	0	0.00E+00	0.000	9.76E-05	8.70E-02	8.71E-02	2.08E-03

Max Annual averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (lb/hr)	**B Asphalt Tank Heater** Max Emission Rate for Pollutant (lb/hr)	**C1 G1< 600 hp Generator** Max Emission Rate for Pollutant (lb/hr)	**C2 G2 > 600hp Generator** Max Emission Rate for Pollutant (lb/hr)	**D1 Silo Filling** Emission Rate for Pollutant (lb/hr)	**D2 Load-out** Emission Rate for Pollutant (lb/hr)	**Load Conveyor** Emission Rate for Pollutant (lb/hr)	**Screen** Emission Rate for Pollutant (lb/hr)
PM-2.5	3.38	0	0.00E+00	0.000	8.88E-05	7.91E-02	7.92E-02	1.89E-03
NOx	8.33	0	0.00	0.0	--	--	--	--

Facility: Interstate Concrete & Asphalt - 00617

6/7/2021 10:05 **Permit/Facility ID:** 0 0

TAPs MODELING

POUNDS PER HOUR - POINT AND PSEUDO-STACK SOURCES

Maximum Controlled Emissions of Any Pollutant from Drum Mix HMA Plant with Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected = #2 Fuel Oil Used Oil Natural Gas LPG/Propane

B. Tank Heater: **10.0000** MMBtu Rated **4,000** Hours/year **24** hrs/day

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

C1. IC Engine: **0.00** gal/hour **0** Hours/year IC Engine < 600hp #2 Fuel Oil **0** hrs/day

C2. IC Engine: **0.00** gal/hour **0** Hours/year IC Engine > 600hp **No Generator** #2 Fuel Oil **0** hrs/day

Pollutant	A Drum Dryer Max Emission Rate for Pollutant (lb/hr)	B Asphaltic Oil Tank Heater Max Emission Rate for Pollutant (lb/hr)	C1 * see note IC1< 600 bhp Generator Max Emission Rate for Pollutant (lb/hr)	C2 * see note IC2 > 600 bhp Generator Max Emission Rate for Pollutant (lb/hr)	D1 Silo Filling Emission Rate for Pollutant (lb/hr)	D2 Load-out Emission Rate for Pollutant (lb/hr)
PM (total)						
PM-10 (total)						
PM-2.5						
CO						
NOx						
SO_2						
VOC						
Lead						
HCl [e]	8.40E-02	0.00E+00	0	0		
Dioxins						
2,3,7,8-TCDD	3.18E-11		0	0		
Total TCDD	1.41E-10		0	0		
1,2,3,7,8-PeCDD	4.70E-11		0	0		
Total PeCDD	3.33E-09		0	0		
1,2,3,4,7,8-HxCDD	6.36E-11	0.00E+00	0	0		
1,2,3,6,7,8-HxCDD	1.97E-10		0	0		
1,2,3,7,8,9-HxCDD	1.48E-10	0.00E+00	0	0		
Total HxCDD	1.82E-09		0	0		
1,2,3,4,6,7,8-Hp-CDD	7.27E-10	0.00E+00	0	0		
Total HpCDD	2.88E-09	0.00E+00	0	0		
Octa CDD	3.79E-09	0.00E+00	0	0		
Total PCDD [h]	1.20E-08	0.00E+00	0	0		
Furans						
2,3,7,8-TCDF	1.47E-10		0	0		
Total TCDF	5.61E-10	0.00E+00	0	0		
1,2,3,7,8-PeCDF	6.52E-10		0	0		
2,3,4,7,8-PeCDF	1.27E-10		0	0		
Total PeCDF	1.27E-08	0.00E+00	0	0		
1,2,3,4,7,8-HxCDF	6.06E-10		0	0		
1,2,3,6,7,8-HxCDF	1.82E-10		0	0		
2,3,4,6,7,8-HxCDF	2.88E-10		0	0		
1,2,3,7,8,9-HxCDF	1.27E-09		0	0		
Total HxCDF	1.97E-09	0.00E+00	0	0		
1,2,3,4,6,7,8-HpCDF	9.85E-10		0	0		
1,2,3,4,7,8,9-HpCDF	4.09E-10		0	0		
Total HpCDF	1.52E-09	0.00E+00	0	0		
Octa CDF	7.27E-10	0.00E+00	0	0		
Total PCDF [h]	6.06E-09	0.00E+00	0	0		
Total PCDD/PCDF [h]	1.82E-08	0.00E+00	0	0		
Non-PAH HAPs						
Acetaldehyde [e]	**1.97E-01**		0	0		
Acrolein [e]	4.33E-03		0	0		
Benzene [e]	**5.91E-02**	**0.00E+00**	0	0	**5.91E-04**	**3.28E-04**
1,3-Butadiene [e]			0	0		
Ethylbenzene [e]	4.00E-02		0	0	7.72E-04	1.94E-03
Formaldehyde [e]	**4.70E-01**	**0.00E+00**	0	0	**1.27E-02**	**5.55E-04**
Hexane [e]	1.53E-01	0.00E+00	0	0	2.03E-03	1.04E-03
Isooctane	6.67E-03		0	0	6.30E-06	1.25E-05
Methyl Ethyl Ketone [e]	3.33E-03		0	0	7.92E-04	3.40E-04
Pentane [e]		0.00E+00	0	0		
Propionaldehyde [e]	2.17E-02		0	0		

Pollutant	A Drum Dryer Max Emission Rate for Pollutant (lb/hr)	B Asphaltic Oil Tank Heater Max Emission Rate for Pollutant (lb/hr)	C1 * see note IC1< 600 bhp Generator Max Emission Rate for Pollutant (lb/hr)	C2 * see note IC2 > 600 bhp Generator Max Emission Rate for Pollutant (lb/hr)	D Silo Filling Emission Rate for Pollutant (lb/hr)	D2 Load-out Emission Rate for Pollutant (lb/hr)
PAH HAPs						
2-Methylnaphthalene	**2.58E-02**	**0.00E+00**	0	0	**2.03E-03**	**1.23E-03**
3-Methylchloranthrene [e]	**0.00E+00**	**0.00E+00**	0	0		
Acenaphthene	**2.12E-04**	**0.00E+00**	0	0	**1.81E-04**	**1.34E-04**
Acenaphthylene	**3.33E-03**	**0.00E+00**	0	0	**5.39E-06**	**1.45E-05**
Anthracene	**4.70E-04**	**0.00E+00**	0	0	**5.00E-05**	**3.62E-05**
Benzo(a)anthracene [e]	**3.18E-05**	**0.00E+00**	0	0	**2.15E-05**	**9.81E-06**
Benzo(a)pyrene [e]	**1.48E-06**	**0.00E+00**	0	0	**0.00E+00**	**1.19E-06**
Benzo(b)fluoranthene [e]	**1.52E-05**	**0.00E+00**	0	0	**0.00E+00**	**3.93E-06**
Benzo(e)pyrene	**1.67E-05**	**0.00E+00**	0	0	**3.65E-06**	**4.03E-06**
Benzo(g,h,I)perylene	**6.06E-06**	**0.00E+00**	0	0	**0.00E+00**	**9.81E-07**
Benzo(k)fluoranthene [e]	**6.21E-06**	**0.00E+00**	0	0	**0.00E+00**	**1.14E-06**
Chrysene [e]	**2.73E-05**	**0.00E+00**	0	0	**8.08E-05**	**5.32E-05**
Dibenzo(a,h)anthracene [e]	**0.00E+00**	**0.00E+00**	0	0	**0.00E+00**	**1.91E-07**
Dichlorobenzene	**0.00E+00**	**0.00E+00**	0	0		
Fluoranthene	**9.24E-05**	**0.00E+00**	0	0	**5.77E-05**	**2.58E-05**
Fluorene	**1.67E-03**	**0.00E+00**	0	0	**3.89E-04**	**3.98E-04**
Indeno(1,2,3-cd)pyrene [e]	**1.06E-06**	**0.00E+00**	0	0	**0.00E+00**	**2.43E-07**
Naphthalene [e]	**9.85E-02**	**0.00E+00**	0	0	**7.00E-04**	**6.46E-04**
Perylene	**1.33E-06**	**0.00E+00**	0	0	**1.15E-05**	**1.14E-05**
Phenanthrene	**3.48E-03**	**0.00E+00**	0	0	**6.92E-04**	**4.18E-04**
Pyrene	**4.55E-04**	**0.00E+00**	0	0	**1.69E-04**	**7.75E-05**
Non-HAP Organic Compounds						
Acetone [e]	1.38E-01	0.00E+00	0	0	1.12E-03	3.24E-04
Benzaldehyde	1.83E-02	0.00E+00	0	0		
Butane	1.12E-01	0.00E+00	0	0		
Butyraldehyde	2.67E-02	0.00E+00	0	0		
Crotonaldehyde [e]	1.43E-02	0.00E+00	0	0		
Ethylene	1.17E+00	0.00E+00	0	0	2.23E-02	4.92E-03
Heptane	1.57E+00	0.00E+00	0	0		
Hexanal	1.83E-02	0.00E+00	0	0		
Isovaleraldehyde	5.33E-03	0.00E+00	0	0		
2-Methyl-1-pentene	6.67E-01	0.00E+00	0	0		
2-Methyl-2-butene	9.67E-02	0.00E+00	0	0		
3-Methylpentane	3.17E-02	0.00E+00	0	0		
1-Pentene	3.67E-01	0.00E+00	0	0		
n-Pentane	3.50E-02	0.00E+00	0	0		
Valeraldehyde [e]	1.12E-02	0.00E+00	0	0		
Metals						
Antimony [e]	3.00E-05	0.00E+00	0	0		
Arsenic [e]	**8.48E-05**	**0.00E+00**	0	0		
Barium [e]	9.67E-04	0.00E+00	0	0		
Beryllium [e]	**0.00E+00**	**0.00E+00**	0	0		
Cadmium [e]	**6.21E-05**	**0.00E+00**	0	0		
Chromium [e]	9.17E-04	0.00E+00	0	0		
Cobalt [e]	4.33E-06	0.00E+00	0	0		
Copper [e]	5.17E-04	0.00E+00	0	0		
Hexavalent Chromium [e]	**6.82E-05**	**0.00E+00**	0	0		
Manganese [e]	1.28E-03	0.00E+00	0	0		
Mercury [e]	4.33E-04	0.00E+00	0	0		
Molybdenum [e]	0.00E+00	0.00E+00	0	0		

Quinone [e]	2.67E-02		0	0		
Methyl chloroform [e]	8.00E-03		0	0		
Toluene [e]	4.83E-01	0.00E+00	0	0	1.26E-03	1.46E-03
Xylene [e]	3.33E-02		0	0	5.22E-03	8.39E-03
POM (7-PAH Group)	**8.30E-05**	**0.00E+00**		**0.00E+00**	**1.02E-04**	**6.97E-05**

Nickel[e]	**9.55E-03**	**0.00E+00**	0	0		
Phosphorus [e]	4.67E-03	0.00E+00	0	0		
Silver[e]	8.00E-05	0.00E+00	0	0		
Selenium[e]	5.83E-05	0.00E+00	0	0		
Thallium[e]	6.83E-07	0.00E+00	0	0		
Vanadium[e]	0.00E+00	0.00E+00	0	0		
Zinc[e]	1.02E-02	0.00E+00	0	0		

e) IDAPA Toxic Air Pollutant

Criteria Pollutant lb/hr emissions are maximum 1-hr averages

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Pollutants shown in blue text are emitted only when burning Used Oil, but not when burning #2 Fuel Oil or Natural Gas

* TAPs from IC engines are set to zero because they are regulated by a NSPS/NESHAP

Facility: **Interstate Concrete & Asphalt - 00617**

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1. HMA Plant Emission Release Parameters

Point Sources

Release Point	Source Type	Stack Height (m)	Modeled Diameter (m)	Stack Gas Temp. (K)	Stack Gas Flow Velocity (m/s)
DRYER	Point	10.06	1.37	407.04	16.34
SILOFILL	Point	9.00	3.00	346.00	0.10
LOAD	Point	3.50	3.00	346.00	0.10
GEN2	Point	4.08	0.21	695.37	50.48
GEN1	Point	3.54	0.15	802.04	44.03

Volume Sources

Release Point	Source Type	Release Height (m)	Initial Horizontal Dispersion Coefficient ∂y (m)	Initial Vertical Dispersion Coefficient ∂z (m)
LOADCONV	Volume	2.50	4.65	1.16
SCREEN	Volume	3.00	0.93	2.33

2. UTM Coordinates of Modeled Release Points

Release Point	Description	Source Type	Modeled Coordinates	
			Easting (m)	Northing (m)
DRYER	Asphalt drum dryer	Point	0.0	0.0
GEN2	IC engine powering main generator	Point	5.0	5.0
GEN1	IC engine powering secondary engine	Point	5.0	-5.0
SILOFILL	Loading of asphalt storage silo	Point	-5.0	-5.0
LOAD	Asphalt loadout from silo to truck	Point	-5.0	-5.0
LOADCONV	Aggregate handling by loader/conveyors	Volume	0.0	0.0
SCREEN	Scalping screen	Volume	-5.0	5.0

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

CRITERIA POLLUTANT MODELING

POUNDS PER HOUR - POINT AND PSEUDO-STACK SOURCES

Maximum Controlled Emissions of Any Pollutant from Drum Mix HMA Plant with Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day 10. hr/day 2,500 hr/yr

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected =

#2 Fuel Oil	Used Oil	Natural Gas	LPG/Propane
0.0500% S	0.1000% S	**24** hrs/day	

B. Tank Heater: **10.0000** MMBtu Rated **4,000** Hours/year

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

0.5000% S		

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine < 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

Criteria Pollutant Emission Modeling Results

Criteria Air Pollutant	Met Station Location	Averaging Period	Modeled Result ($\mu g/m^3$)	Averaged Background Concentration ($\mu g/m^3$)	Design value ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)	NAAQS Exceeded?
PM_{10} [a]	Boise	24-hr	37.09444	93.1	130	150	No
PM_{10} [a]	Bonner	24-hr	38.12115	93.1	131	150	No
PM_{10} [a]	Burley	24-hr	45.21314	93.1	138	150	No
PM_{10} [a]	Challis	24-hr	28.8375	93.1	122	150	No
PM_{10} [a]	Coeur d'Alene	24-hr	54.10553	93.1	147	150	No
PM_{10} [a]	Grangeville	24-hr	27.64466	93.1	121	150	No
PM_{10} [a]	ID Falls	24-hr	38.25616	93.1	131	150	No
PM_{10} [a]	INL	24-hr	25.46686	93.1	119	150	No
PM_{10} [a]	Jerome	24-hr	43.92572	93.1	137	150	No
PM_{10} [a]	Lewiston	24-hr	24.09090	93.1	117	150	No
PM_{10} [a]	McCall	24-hr	26.26306	93.1	119	150	No
PM_{10} [a]	Moscow	24-hr	53.24673	93.1	146	150	No
PM_{10} [a]	MT Home	24-hr	31.3694	93.1	124	150	No
PM_{10} [a]	Pocatello Airport	24-hr	30.03316	93.1	123	150	No
PM_{10} [a]	Pocatello DEQ	24-hr	21.61359	93.1	115	150	No
PM_{10} [a]	Rexburg	24-hr	47.328	93.1	140	150	No
PM_{10} [a]	Sandpoint	24-hr	52.64203	93.1	146	150	No
PM_{10} [a]	Soda Springs	24-hr	49.23452	93.1	142	150	No
PM_{10} [a]	Spokane	24-hr	47.58131	93.1	141	150	No
PM_{10} [a]	Twin Falls	24-hr	29.95819	93.1	123	150	No
$PM_{2.5}$ [b]	Boise	24-hr	7.5	27	30	35	No
$PM_{2.5}$ [b]	Bonner	24-hr	4.3	27	28	35	No
$PM_{2.5}$ [b]	Burley	24-hr	8.7	27	30	35	No
$PM_{2.5}$ [b]	Challis	24-hr	3.7	27	28	35	No
$PM_{2.5}$ [b]	Coeur d'Alene	24-hr	8.5	27	30	35	No
$PM_{2.5}$ [b]	Grangeville	24-hr	5.8	27	29	35	No
$PM_{2.5}$ [b]	ID Falls	24-hr	10	27	30	35	No
$PM_{2.5}$ [b]	INL	24-hr	10	27	30	35	No

$PM_{2.5}$[b]	Jerome	24-hr	8.9	27	30	35	No
$PM_{2.5}$[b]	Lewiston	24-hr	4.2	27	28	35	No
$PM_{2.5}$[b]	McCall	24-hr	5.0	27	29	35	No
$PM_{2.5}$[b]	Moscow	24-hr	9.3	27	30	35	No
$PM_{2.5}$[b]	MT Home	24-hr	10	27	30	35	No
$PM_{2.5}$[b]	Pocatello Airport	24-hr	9.2	27	30	35	No
$PM_{2.5}$[b]	Pocatello DEQ	24-hr	8.1	27	30	35	No
$PM_{2.5}$[b]	Rexburg	24-hr	8.6	27	30	35	No
$PM_{2.5}$[b]	Sandpoint	24-hr	8.7	27	30	35	No
$PM_{2.5}$[b]	Soda Springs	24-hr	7.8	27	30	35	No
$PM_{2.5}$[b]	Spokane	24-hr	7.8	27	30	35	No
$PM_{2.5}$[b]	Twin Falls	24-hr	8.0	27	30	35	No

$PM_{2.5}$[c]	Boise	Annual	3.06	7.94	9.0	12	No
$PM_{2.5}$[c]	Bonner	Annual	1.35	7.94	8.4	12	No
$PM_{2.5}$[c]	Burley	Annual	2.99	7.94	8.9	12	No
$PM_{2.5}$[c]	Challis	Annual	1.62	7.94	8.5	12	No
$PM_{2.5}$[c]	Coeur d'Alene	Annual	2.75	7.94	8.9	12	No
$PM_{2.5}$[c]	Grangeville	Annual	1.68	7.94	8.5	12	No
$PM_{2.5}$[c]	ID Falls	Annual	3.83	7.94	9.2	12	No
$PM_{2.5}$[c]	INL	Annual	2.98	7.94	8.9	12	No
$PM_{2.5}$[c]	Jerome	Annual	2.74	7.94	8.9	12	No
$PM_{2.5}$[c]	Lewiston	Annual	1.38	7.94	8.4	12	No
$PM_{2.5}$[c]	McCall	Annual	1.42	7.94	8.4	12	No
$PM_{2.5}$[c]	Moscow	Annual	2.77	7.94	8.9	12	No
$PM_{2.5}$[c]	MT Home	Annual	3.08	7.94	9.0	12	No
$PM_{2.5}$[c]	Pocatello Airport	Annual	3.04	7.94	9.0	12	No
$PM_{2.5}$[c]	Pocatello DEQ	Annual	2.19	7.94	8.7	12	No
$PM_{2.5}$[c]	Rexburg	Annual	3.4	7.94	9.1	12	No
$PM_{2.5}$[c]	Sandpoint	Annual	2.35	7.94	8.7	12	No
$PM_{2.5}$[c]	Soda Springs	Annual	2.98	7.94	8.9	12	No
$PM_{2.5}$[c]	Spokane	Annual	2.84	7.94	8.9	12	No
$PM_{2.5}$[c]	Twin Falls	Annual	3.24	7.94	9.0	12	No
NO_2[d]	Boise	1-hr	283	71.3	166	188	No
NO_2[d]	Bonner	1-hr	211	71.3	142	188	No
NO_2[d]	Burley	1-hr	327	71.3	180	188	No
NO_2[d]	Challis	1-hr	270	71.3	161	188	No
NO_2[d]	Coeur d'Alene	1-hr	287	71.3	167	188	No
NO_2[d]	Grangeville	1-hr	244	71.3	153	188	No
NO_2[d]	ID Falls	1-hr	302	71.3	172	188	No
NO_2[d]	INL	1-hr	251	71.3	155	188	No
NO_2[d]	Jerome	1-hr	313	71.3	176	188	No
NO_2[d]	Lewiston	1-hr	279	71.3	164	188	No
NO_2[d]	McCall	1-hr	246	71.3	153	188	No
NO_2[d]	Moscow	1-hr	309	71.3	174	188	No
NO_2[d]	MT Home	1-hr	260	71.3	158	188	No
NO_2[d]	Pocatello Airport	1-hr	275	71.3	163	188	No
NO_2[d]	Pocatello DEQ	1-hr	207	71.3	140	188	No
NO_2[d]	Rexburg	1-hr	303	71.3	172	188	No
NO_2[d]	Sandpoint	1-hr	256	71.3	157	188	No
NO_2[d]	Soda Springs	1-hr	240	71.3	151	188	No
NO_2[d]	Spokane	1-hr	331	71.3	182	188	No
NO_2[d]	Twin Falls	1-hr	306	71.3	173	188	No

NO_2[e]	Boise	Annual	25.9	17.1	43	100	No
NO_2[e]	Bonner	Annual	15.3	17.1	32	100	No
NO_2[e]	Burley	Annual	28.1	17.1	45	100	No
NO_2[e]	Challis	Annual	11.27	17.1	28	100	No
NO_2[e]	Coeur d'Alene	Annual	16.3	17.1	33	100	No
NO_2[e]	Grangeville	Annual	15.2	17.1	32	100	No
NO_2[e]	ID Falls	Annual	41.5	17.1	59	100	No
NO_2[e]	INL	Annual	33.5	17.1	51	100	No
NO_2[e]	Jerome	Annual	28.1	17.1	45	100	No
NO_2[e]	Lewiston	Annual	13.8	17.1	31	100	No
NO_2[e]	McCall	Annual	15.6	17.1	33	100	No
NO_2[e]	Moscow	Annual	25.8	17.1	43	100	No
NO_2[e]	MT Home	Annual	35.6	17.1	53	100	No
NO_2[e]	Pocatello Airport	Annual	34.6	17.1	52	100	No
NO_2[e]	Pocatello DEQ	Annual	30.6	17.1	48	100	No
NO_2[e]	Rexburg	Annual	32.5	17.1	50	100	No
NO_2[e]	Sandpoint	Annual	14.9	17.1	32	100	No
NO_2[e]	Soda Springs	Annual	17.6	17.1	35	100	No
NO_2[e]	Spokane	Annual	25.2	17.1	42	100	No
NO_2[e]	Twin Falls	Annual	41.2	17.1	58	100	No
SO_2[f]	Boise	1-hr	35.1	20.6	32.3	196	No
SO_2[f]	Bonner	1-hr	33.2	20.6	31.7	196	No
SO_2[f]	Burley	1-hr	26.5	20.6	29.4	196	No
SO_2[f]	Challis	1-hr	26.5	20.6	29.4	196	No
SO_2[f]	Coeur d'Alene	1-hr	25.1	20.6	29.0	196	No
SO_2[f]	Grangeville	1-hr	37.4	20.6	33.1	196	No
SO_2[f]	ID Falls	1-hr	42.3	20.6	34.7	196	No
SO_2[f]	INL	1-hr	41.7	20.6	34.5	196	No
SO_2[f]	Jerome	1-hr	41.2	20.6	34.3	196	No
SO_2[f]	Lewiston	1-hr	27.8	20.6	29.9	196	No
SO_2[f]	McCall	1-hr	34.9	20.6	32.2	196	No
SO_2[f]	Moscow	1-hr	35.2	20.6	32.3	196	No
SO_2[f]	MT Home	1-hr	42.8	20.6	34.9	196	No
SO_2[f]	Pocatello Airport	1-hr	42.7	20.6	34.8	196	No
SO_2[f]	Pocatello DEQ	1-hr	40.0	20.6	33.9	196	No
SO_2[f]	Rexburg	1-hr	36.0	20.6	32.6	196	No
SO_2[f]	Sandpoint	1-hr	30.4	20.6	30.7	196	No
SO_2[f]	Soda Springs	1-hr	40.8	20.6	34.2	196	No
SO_2[f]	Spokane	1-hr	31.6	20.6	31.1	196	No
SO_2[f]	Twin Falls	1-hr	41.8	20.6	34.5	196	No

SO_2[g]	Boise	3-hr	34.7	23.9	58.6	1,300	No
SO_2[g]	Bonner	3-hr	39.2	23.9	63.1	1,300	No
SO_2[g]	Burley	3-hr	28.6	23.9	52.5	1,300	No
SO_2[g]	Challis	3-hr	28.6	23.9	52.5	1,300	No
SO_2[g]	Coeur d'Alene	3-hr	29.1	23.9	53.0	1,300	No
SO_2[g]	Grangeville	3-hr	41.2	23.9	65.1	1,300	No
SO_2[g]	ID Falls	3-hr	42.5	23.9	66.4	1,300	No
SO_2[g]	INL	3-hr	41.3	23.9	65.2	1,300	No
SO_2[g]	Jerome	3-hr	42.0	23.9	65.9	1,300	No
SO_2[g]	Lewiston	3-hr	41.7	23.9	65.6	1,300	No
SO_2[g]	McCall	3-hr	34.7	23.9	58.6	1,300	No
SO_2[g]	Moscow	3-hr	38.5	23.9	62.4	1,300	No
SO_2[g]	MT Home	3-hr	41.6	23.9	65.5	1,300	No
SO_2[g]	Pocatello Airport	3-hr	43.0	23.9	66.9	1,300	No
SO_2[g]	Pocatello DEQ	3-hr	39.8	23.9	63.7	1,300	No
SO_2[g]	Rexburg	3-hr	42.1	23.9	66.0	1,300	No
SO_2[g]	Sandpoint	3-hr	36.8	23.9	60.7	1,300	No
SO_2[g]	Soda Springs	3-hr	41.4	23.9	65.3	1,300	No
SO_2[g]	Spokane	3-hr	38.3	23.9	62.2	1,300	No
SO_2[g]	Twin Falls	3-hr	43.9	23.9	67.8	1,300	No

Notes:

a) 24-hr PM_{10} NAAQS are based on expected exceedances of not more than once per year over a 3-year period. When modeling for a 1-year operation, the design value is the 4th highest 24-hr concentration at a specific receptor.

b) Modeled results of 24-hr $PM_{2.5}$ were in the form of a maximum 98th percentile of 24-hr concentrations for a single year, with background not included in the model output results. This value was converted to a design value that accounts for two additional years without operations of the HMA plant.

c) Modeled results of annual $PM_{2.5}$ were in the form of maximum annual average concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant.

d) Modeled results of 1-hr NO_2 were in the form of a maximum 98th percentile of daily maximum 1-hr concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant.

e) Modeled results of annual NO_2 are in the form of maximum annual average concentrations for a single year. The design value is the modeled value plus the background value.

f) Modeled results of 1-hr SO_2 were in the form of a maximum 99th percentile of daily maximum 1-hr concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant.

g) 3-hr SO_2 NAAQS are based on expected exceedances of not more than once per year. The design value is the modeled value plus the background value.

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

CRITERIA POLLUTANT MODELING

POUNDS PER HOUR - POINT AND PSEUDO-STACK SOURCES

Maximum Controlled Emissions of Any Pollutant from Drum Mix HMA Plant with Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day 10. hr/day 2,500 hr/yr

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected =

	#2 Fuel Oil	Used Oil	Natural Gas	LPG/Propane
	0.0500% S	0.1000% S	**24** hrs/day	

B. Tank Heater: **10.0000** MMBtu Rated **4,000** Hours/year

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

0.5000% S			

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine < 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp

0.0500% S	#2 Fuel Oil	**0** hrs/day

TAPs Modeling Results

Location	Modeled Value[a] for each pollutant (µg/m^3)										
	Acetaldehyde	Arsenic	Benzene	Cadmium	Formaldehyde	Hexavalent Chromium	Hydrogen Chloride	Naphthalene 24-hr	Naphthalene annual	Nickel	POMs
Boise	0.03486	1.50E-05	0.0128	1.10E-05	0.14713	1.21E-05	0.20680	0.25198	0.02076	0.00169	0.00151
Bonner	0.04157	1.79E-05	0.01388	1.31E-05	0.12016	1.44E-05	0.18143	0.22307	0.02282	0.00202	0.00059
Burley	0.032	1.38E-05	0.01171	1.01E-05	0.12219	1.11E-05	0.13075	0.16141	0.01901	0.00155	0.00124
Challis	0.01521	6.55E-06	0.00675	4.80E-06	0.08607	5.27E-06	0.09643	0.11786	0.01073	0.00074	0.00086
Coeur d'Alene	0.01569	6.75E-06	0.00875	4.95E-06	0.10943	5.43E-06	0.15597	0.19875	0.01334	0.00076	0.00115
Grangeville	0.0191	8.22E-06	0.00963	6.02E-06	0.10707	6.61E-06	0.29919	0.35907	0.01513	0.00093	0.00089
ID Falls	0.05908	2.54E-05	0.02048	1.86E-05	0.1851	2.05E-05	0.32641	0.39532	0.03354	0.00286	0.00122
INL	0.06925	2.98E-05	0.02332	2.18E-05	0.20445	2.40E-05	0.33473	0.39975	0.0383	0.00336	0.0007
Jerome	0.03776	1.63E-05	0.01319	1.19E-05	0.12274	1.31E-05	0.30375	0.36653	0.02155	0.00183	0.00072
Lewiston	0.016	6.89E-06	0.00729	5.04E-06	0.09137	5.54E-06	0.20820	0.25546	0.01144	0.00078	0.001
McCall	0.02036	8.76E-06	0.00827	6.42E-06	0.08398	7.05E-06	0.27038	0.32062	0.01322	0.00099	0.00086
Moscow	0.02896	1.25E-05	0.01055	9.13E-06	0.10717	1.00E-05	0.19845	0.24224	0.01714	0.0014	0.00095
MT Home	0.05749	2.48E-05	0.0201	1.81E-05	0.18396	1.99E-05	0.27510	0.33267	0.03285	0.00279	0.00087
Pocatello Airport	0.05057	2.18E-05	0.01715	1.59E-05	0.1518	1.75E-05	0.22332	0.2711	0.02814	0.00245	0.00071
Pocatello DEQ	0.05635	2.43E-05	0.0197	1.78E-05	0.17541	1.95E-05	0.26745	0.31703	0.03225	0.00273	0.00055
Rexburg	0.03841	1.65E-05	0.014	1.21E-05	0.17788	1.33E-05	0.32931	0.39763	0.02273	0.00186	0.00194
Sandpoint	0.01502	6.47E-06	0.00934	4.73E-06	0.11206	5.20E-06	0.20956	0.26286	0.01435	0.00073	0.00099
Soda Springs	0.03514	1.51E-05	0.01239	1.11E-05	0.14777	1.22E-05	0.25275	0.302	0.02023	0.0017	0.0016
Spokane	0.02648	1.14E-05	0.01001	8.35E-06	0.10971	9.17E-06	0.19266	0.23525	0.01618	0.00128	0.001
Twin Falls	0.0395	1.70E-05	0.01314	1.25E-05	0.1144	1.37E-05	0.26597	0.31857	0.0216	0.00191	0.00091
AAC (µg/m^3)	--	--	--	--	--	--	375	2,500	--	--	--
AACC[b] (µg/m^3)	4.50	2.30E-03	1.20	5.60E-03	7.70E-01	8.30E-04	--	--	1.40E-01	4.20E-02	3.00E-03

Notes:

a) Modeled values appear green if they do not exceed their respective AAC or AACC values. Modeled values appear red if they do exceed their respective AAC or AACC values.

b) Per IDAPA 58.01.01.210.15, a short term adjustment factor may be used to demonstrate preconstruction compliance. The AACC (for TAPs listed in section 586) are multiplied by ten.

Facility: **Interstate Concrete & Asphalt - 00617**

6/7/2021 9:28 **Permit/Facility ID:** **0** **0**

CRITERIA POLLUTANT MODELING

POUNDS PER HOUR - POINT AND PSEUDO-STACK SOURCES

Maximum Controlled Emissions of Any Pollutant from Drum Mix HMA Plant with Fabric Filter, Tank Heater, Generator, Silo Fill/Load-out

A. Drum Mix Plant: **400** Tons/hour 2,500 Hours/year **1,000,000** Tons/year **4,000** Tons/day 10. hr/day 2,500 hr/yr

Maximum emission for each pollutant from any fuel-burning options selected on "Facility Data" worksheet. Fuels Selected =

	#2 Fuel Oil	Used Oil	Natural Gas	LPG/Propane
	0.0500% S	0.1000% S	**24** hrs/day	
0.5000% S				

B. Tank Heater: **10.0000** MMBtu Rate **4,000** Hours/year

Maximum emission for each pollutant for heater burning any fuel selected on "Facility Data" worksheet. Fuels Selected =

0.0500% S	#2 Fuel Oil	**0** hrs/day
0.0500% S	#2 Fuel Oil	**0** hrs/day

C1. IC Engine 1: **0.00** gal/hour **0** Hours/year IC Engine < 600hp

C2. IC Engine 2: **0.00** gal/hour **0** Hours/year IC Engine > 600hp

Max 1-hour, 3-hour, and 8-hour averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (g/s)	**B Asphaltic Oil Tank Heater** Max Emission Rate for Pollutant (g/s)	**C1 IC1< 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**C2 IC2 > 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**D1 Silo Filling** Emission Rate for Pollutant (g/s)	**D2 Load-out** Emission Rate for Pollutant (g/s)	**Load Conveyor** Emission Rate for Pollutant (g/s)	**Screen** Emission Rate for Pollutant (g/s)
NO_X 1-hr	2.77	0	0.00	0.0	--	--	--	--
SO_2 1-hr, 3-hr	0.90	0	0.00E+00	0.000	--	--	--	--

Max 24-hour averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (g/s)	**B Asphaltic Oil Tank Heater** Max Emission Rate for Pollutant	**C1 IC1< 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**C2 IC2 > 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**D1 Silo Filling** Emission Rate for Pollutant (g/s)	**D2 Load-out** Emission Rate for Pollutant (g/s)	**Load Conveyor** Emission Rate for Pollutant (g/s)	**Screen** Emission Rate for Pollutant (g/s)
PM-10 (total)	0.48	0	0.000	0.000	1.23E-05	1.10E-02	0.138	0.018
PM-2.5	0.47	0	0.00E+00	0.000	1.23E-05	1.10E-02	2.09E-02	2.62E-04

Max Annual averages

Pollutant	**A Drum Mix** Max Emission Rate for Pollutant (g/s)	**B Asphaltic Oil Tank Heater** Max Emission Rate for Pollutant	**C1 IC1< 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**C2 IC2 > 600 bhp Generator** Max Emission Rate for Pollutant (g/s)	**D1 Silo Filling** Emission Rate for Pollutant (g/s)	**D2 Load-out** Emission Rate for Pollutant (g/s)	**Load Conveyor** Emission Rate for Pollutant (g/s)	**Screen** Emission Rate for Pollutant (g/s)
PM-2.5	0.43	0	0.00E+00	0.000	1.12E-05	9.96E-03	1.90E-02	2.38E-04
NOx	1.05	0	0.00	0.0	--	--	--	--

Location	PM10 (24-hr) ug/m3	PM2.5 (24-hr) ug/m3	PM2.5 (annual) ugm3	NO2 (1-hr) ppb
Boise	79.9	26.8	8.1	45.7
Nampa	80.8	26	8	43.4
Coeur d'Alene	96.9	25.1	7.6	17.6
McCall	60.1	17.5	5.1	7.6
St. Maries	94.5	36	7	5.9
Pocatello	74.1	18	6.1	36.4
Soda Springs	72.1	16.3	4.2	13.6
Payette	87.3	22.5	6.8	21
Kamiah	80.5	18.1	5.6	5.3
Rathdrum	94.3	20.5	6.9	15.8
Lewiston	92.7	16.9	5.9	15.9
Grangeville	73.3	17.6	4.8	5.8
Star	75.3	27.2	7.8	36.4
Twin Falls	78.3	13.8	6.4	38.6
Blackfoot	72.4	16.4	6.8	34.9
Plummer	91.3	25.5	5.9	4.9
Sandpoint	97.5	23.3	7.6	15.9
Idaho Falls	74.6	15.6	6.6	35.9
Burley	76.9	12.3	5.8	36.9
Caldwell	79.5	26.6	8.2	41.6
Mountain Home	90.3	20.3	6	25.3
Average	82.0	21.1	6.5	24.0
Standard Deviation	9.8	5.6	1.1	14.0
Design Value	91.9	26.7	7.6	38.0
Convert from ppb to ug/m3				71.5

NW Airquest values 2014-2017.
Statewide background concentration and applicable averagin gperiod =mean of all locations plus the standard devi

NO2 (annual) ppb	SO2 (1-hr) ppb	SO2 (3-hr) ppb
13.4	5.5	6.3
12.7	6.4	7.1
3.8	4.8	6.5
1.4	4.7	6.4
1.3	4.7	6.4
7.1	6.1	7.3
2.6	15.4	16.2
4.8	4.8	6.5
1.3	4.7	6.4
3.9	4.7	6.4
3.7	4.8	6.5
1	4.7	6.4
8.2	4.6	5.7
7	5.8	7.1
6.8	6.1	7.3
1.1	4.7	6.4
4.5	4.7	6.4
7	5.2	6.7
6.6	5.2	6.7
11.5	5.2	6.6
4.9	4.8	6.4
5.5	5.6	7.0
3.6	2.3	2.1
9.1	7.9	9.1
17.1	20.6	23.9

ation.

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSIS

M E M O R A N D U M DRAFT

DATE: April 9, 2021

TO: Zach Pierce, Permit Writer, Air Program

FROM: Kevin Schilling, Stationary Source Modeling Coordinator, Air Program

PROJECT: P-2020.0041 PROJ 62549, Modification of Existing Permit to Construct (PTC) for Interstate Concrete & Asphalt Portable Hot Mix Asphalt Plant.

SUBJECT: Demonstration of Compliance with IDAPA 58.01.01.203.02 (NAAQS) and 203.03 (TAPs) as it relates to air quality impact analyses.

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Acronyms, Units, and Chemical Nomenclature

AAC	Acceptable Ambient Concentration of a non-carcinogenic TAP
AACC	Acceptable Ambient Concentration of a Carcinogenic TAP
acfm	Actual cubic feet per minute
AERMAP	The terrain data preprocessor for AERMOD
AERMET	The meteorological data preprocessor for AERMOD
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
Appendix W	40 CFR 51, Appendix W – Guideline on Air Quality Models
bhp	brake horsepower
BPIP	Building Profile Input Program
BRC	Below Regulatory Concern
CFR	Code of Federal Regulations
CMAQ	Community Multi-Scale Air Quality Modeling System
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
EL	Emissions Screening Level of a TAP
EPA	United States Environmental Protection Agency
GEP	Good Engineering Practice
hr	hours
HMA	Hot mix asphalt
IC	internal combustion
ICA	Interstate Concrete & Asphalt
Idaho Air Rules	Rules for the Control of Air Pollution in Idaho, located in the Idaho Administrative Procedures Act 58.01.01
ISCST3	Industrial Source Complex Short Term 3 dispersion model
K	Kelvin
m	Meters
m/sec	Meters per second
MMBtu	Million British Thermal Units
NAAQS	National Ambient Air Quality Standards
NO	Nitrogen Oxide
NO_2	Nitrogen Dioxide
NOx	Oxides of Nitrogen
NWS	National Weather Service
O_3	Ozone
PAH	Polyaromatic Hydrocarbons
Pb	Lead
PM_{10}	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 10 micrometers
$PM_{2.5}$	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 2.5 micrometers
POM	Polycyclic Organic Matter
ppb	parts per billion
PRIME	Plume Rise Model Enhancement
PTC	Permit to Construct
PTE	Potential to Emit
SIL	Significant Impact Level
SO_2	Sulfur Dioxide
Spring Env	Spring Environmental Inc.
TAP	Toxic Air Pollutant
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compounds
$\mu g/m^3$	Micrograms per cubic meter of air

1.0 Summary

Interstate Concrete & Asphalt (ICA) submitted a Permit to Construct (PTC) application for operation of a portable hot mix asphalt (HMA) plant in Idaho. Idaho Administrative Procedures Act 58.01.01.203.02 and 203.03 (Idaho Air Rules Section 203.02 and 203.03) requires that no permit be issued unless it is demonstrated that applicable emissions do not result in violation of a National Ambient Air Quality Standard (NAAQS) or Toxic Air Pollutant (TAP) increment. This memorandum provides a summary of the applicable impact analysis requirements and a summary of those analyses used to demonstrate compliance with applicable NAAQS and TAP increments, as required by Idaho Air Rules Section 203.02 and 203.03.

ICA is requesting a PTC for an HMA plant that will not remain at any one location for more than 1 year and will not operate during the period of December through March for each year. The application asserts the plant will maintain a minimum setback distance of 125 meters between the emission stacks of the drum dryer and generators and the nearest property boundary of the facility.

Air impact analyses were performed by Spring Environmental Inc. (Spring Env), ICA's permitting consultant, and were submitted with the PTC application. DEQ review of submitted data and analyses, as summarized by this memorandum, addressed only the rules, policies, methods, and data pertaining to the air impact analyses used to demonstrate that estimated emissions associated with operation of the facility will not cause or significantly contribute to a violation of any applicable air quality standard. This review did not address/evaluate compliance with other rules or analyses not pertaining to the air impact analyses. Evaluation of emission estimates was primarily the responsibility of the DEQ permit writer and is addressed in the main body of the DEQ Statement of Basis.

Table 1 presents key assumptions and results to be considered in the development of the permit. Idaho Air Rules require air impact analyses be conducted in accordance with methods outlined in 40 CFR 51, Appendix W *Guideline on Air Quality Models* (Appendix W). Appendix W requires that air quality impacts be assessed using atmospheric dispersion models with emissions and operations representative of design capacity or as limited by a federally enforceable permit condition.

The submitted information, in combination with DEQ's analyses: 1) utilized appropriate methods and models; 2) was conducted using reasonably accurate or conservative model parameters and input data (review of emissions estimates was addressed by the DEQ permit writer); 3) adhered to established DEQ guidelines for new source review dispersion modeling; 4) showed either a) that estimated potential/allowable emissions are at a level defined as below regulatory concern (BRC) and do not require a NAAQS compliance demonstration; b) that predicted pollutant concentrations from emissions associated with the project as modeled were below Significant Impact Levels (SILs) or other applicable regulatory thresholds; or c) that predicted pollutant concentrations from emissions associated with the project as modeled, when appropriately combined with co-contributing sources and background concentrations, were below applicable NAAQS at ambient air locations where and when the project has a significant impact; 5) showed that TAP emissions increases associated with the project will not result in increased emissions above ELs or ambient air impacts exceeding allowable TAP increments. This conclusion assumes that conditions in Table 1 are representative of facility design capacity or operations as limited by a federally enforceable permit condition. The DEQ permit writer should use Table 1 and other information presented in this memorandum to generate appropriate permit provisions/restrictions to assure the requirements of Appendix W are met regarding emissions representative of design capacity or permit allowable rates.

Summary of Submittals and Actions

- December 15, 2020: Application received by DEQ.
- December 17, 2020: Regulatory start date.
- January 15, 2021: Application determined incomplete by DEQ.
- February 12, 2021: Submittal of information/data to DEQ, addressing incompleteness issues.
- March 12, 2021: Application determined complete by DEQ.

Table 1. KEY CONDITIONS USED IN MODELING ANALYSES FOR OPERATION AT THE IDAHO FALLS SITE

Criteria/Assumption/Result	Explanation/Consideration
Emission Source Setback from Ambient Air Boundary. A minimum setback distances of 125 meters must be maintained between the nearest point of potential public access and the stacks of the drum dryer and the stacks of the generators.	The applicable setback distance is necessary to assure compliance with air quality standards at ambient air locations. Areas not under direct control of the permittee cannot be excluded from consideration as ambient air.
Allowable Production. Maximum HMA production does not exceed allowable rates of 400 ton/hour, 4,000 ton/day, and 1,000,000 ton/year.	Short-term and annual pollutant impact analyses were performed using emissions based on these rates. These rates must not be exceeded.
Annual Relocation Requirement. Air impact analyses were performed considering that the HMA plant will not remain at any single site for a duration of more than 12 months.	NAAQS and TAP increment compliance is not assured for operations exceeding 12 months at any one site. A permit condition is needed to restrict operations at any specific site to a time duration of not more than 12 months.
Seasonal Operations. Air impact analyses were performed considering that the HMA plant will not operate during December 1 through February 28.	NAAQS and TAP increment compliance is not assured if operations occur during December 1 – February 28. A permit condition is needed to restrict operations from this period.
Operations with Generators. When diesel-fired generators are used, impacts were based on using a 1,161brake horsepower (bhp) engine (maximum of 12 hour/day, 4,380 hour/year) and a 306 bhp engine (maximum of 24 hour/day, 4,380 hour/year). The engines may not operate simultaneously.	Engines used at the site must be no larger than 1,161 bhp and 306 bhp. The analysis assumes no other non-vehicle engines are operated at the facility.
Asphalt Silo Filling Emissions. Emissions from the transfer of asphalt from the drum dryer to the asphalt storage silo will be captured and vented back to the drum dryer for destruction/control. It was assumed that routing of these emissions to the drum dryer will not alter emissions from the drum dryer stack (as indicated in the emission calculation spreadsheet).	NAAQS and TAP increment compliance has not been demonstrated if emissions from silo loading are not captured and routed back to the drum dryer.
Drum Dryer Stack Height. The drum dryer stack height is at least 33.0 feet (10 meters) from ground level.	This stack height was used in the air impact modeling analyses.
Control of Vehicle Fugitive Emissions: Air impact analyses were performed assuming fugitive particulate emissions from vehicle traffic on unpaved roadways is negligible and could be reasonably accounted for in the background concentration used in the impact analyses.	Emissions from vehicle traffic must be controlled to a high degree, otherwise compliance with particulate NAAQS has not been demonstrated.
General Emissions Rates. Emissions rates used in the impact analyses, as listed in this memorandum, must represent maximum emissions as given by design capacity, inherently limited by the process or configuration of the facility, or as limited by the issued permit for the specific pollutant and averaging period.	Compliance has not been demonstrated for emissions rates greater than those used in the air impact modeling analyses.

Table 1. KEY CONDITIONS USED IN MODELING ANALYSES FOR OPERATION AT THE IDAHO FALLS SITE	
Criteria/Assumption/Result	**Explanation/Consideration**
Location with other pollutant emitting equipment. Co-contributing emissions sources such as other HMA plants, concrete batch plants (CBPs), and/or rock crushing plants will not locate on the plant property within 1,000 feet of the drum dryer stack of the HMA plant, except as noted below for a rock crushing plant. NAAQS compliance is assured for the HMA plant operating with a co-contributing rock crushing plant, provided the HMA plant does not operate at a daily production rate of more than half that allowed by the issued PTC (2,000 ton/day) on any day when the rock crushing plant operates, and provided the annual actual throughput of the rock crushing plant is less than 500,000 ton/year.	Emissions are considered co-contributing if they occur within 1,000 feet (305 meters) of each other. Once the HMA plant is established at a site, the facility is not responsible for controlling other facilities from moving in nearby, provided they are not on the same property as the permittee. Neighboring facilities would be required to account for the HMA impacts for their own permitting analyses.
Operation in Non-Attainment Areas: The HMA plant will not locate within any area designated as non-attainment for a NAAQS.	Impact analyses performed for this project assumed background concentrations of criteria pollutants are well below NAAQS.
Release Parameters for Emission Points. Stack heights are no shorter than what is indicated in this memorandum. Most importantly, the drum dryer stack height must be no less than 33 feet. Stack diameters are no larger than what is indicated in this memorandum. Exhaust flow rates and temperatures at the point of release are not less than about 80 percent of the values indicated in this memorandum.	Compliance with applicable air quality standards is not assured if release parameters vary substantially from what was used in impact analyses.

2.0 Background Information

This section provides background information applicable to the project and sites where the facility may be located. It also provides a brief description of the applicable air impact analyses requirements for the project.

2.1 Project Description, Proposed Location, and Area Classification

The proposed project is an initial PTC for a portable HMA plant. The operational parameters include the following:

1) production rates not to exceed 400 ton/hour, 4,000 ton/day, and 1,000,000 ton/year;

2) when generators are use, they will be powered by two diesel-fired internal combustion (IC) engines: 1) 1,161 bhp (not EPA Tier certified) at 12 hour/day and 4,380 hour/year; 2) 306 bhp (not EPA Tier certified) up to 12 hour/day and 4,380 hour/year. The two engines will not operate simultaneously.

3) the drum dryer stack height will be equal or greater than 33 feet;

4) the drum dryer may be fueled by natural gas, LPG, distillate oil, or Recycled Fuel Oil (RFO) with a sulfur content not to exceed 0.1 percent;

5) the plant will operate on a seasonal basis, with no operations from December 1 through February 28;

6) the plant will not remain at any single location for more than 12 months;

7) a setback between the drum dryer stack and the IC engine stacks and the nearest facility boundary will be no less than 410 feet (125 meters).

Pollutant-emitting processes conducted at the HMA plant include drum drying aggregate and mixing with asphalt oil, handling of aggregate materials, handling of produced asphalt, operation of IC engines to power electrical generators, and miscellaneous fugitive dust from vehicle traffic and wind erosion from aggregate storage piles.

DEQ's air impact modeling analyses for portable facilities involves using a generic layout of sources and structures in the model. The sources are placed in a tight grouping at the center of a polar grid of receptors and impacts are assessed using a variety of meteorological datasets collected from locations throughout Idaho. Spring Env established a minimum setback distance of 125 meters and then performed multiple analyses to demonstrate compliance with applicable NAAQS and TAP increments for established averaging periods and meteorological datasets. The 125-meter setback distance is the minimum distance between the emission sources (drum dryer stack and IC engine stacks) and the closest point of public access that is necessary to assure compliance with applicable air quality standards.

DEQ's typical process for HMA plant analyses is to perform setback analyses using proposed production levels and equipment specifications provided by the applicant. ICA, through their consultant Spring Env, performed their own analyses to optimize parameters that affect setback distances. To accomplish this, Spring Env requested DEQ computer modeling files and data that were used to assess the impacts and establish setback distances for a different HMA plant project. Spring Env modified the files for characteristics unique to the ICA HMA plant, performed the impact modeling analyses, and proposed a minimum required setback. Spring Env then submitted the project-specific modeling files and data with the application. DEQ's review involved verifying and justifying model inputs and rerunning the model for critical scenarios (those pollutants and meteorological datasets that resulted in the largest impacts for the requested setback distance).

2.2 Air Impact Analyses Required for All Permits to Construct

Criteria Pollutant and TAP Impact Analyses for a PTC are addressed in Idaho Air Rules Sections 203.02 and 203.03:

> *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 stationary source or modification would not cause or significantly contribute to a violation of any ambient air quality standard.*
>
> ***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.*

Atmospheric dispersion modeling, using computerized simulations, is used to demonstrate compliance with both NAAQS and TAPs. Idaho Air Rules Section 202.02 states:

***Estimates of Ambient Concentrations**. All estimates of ambient concentrations shall be based on the applicable air quality models, data bases, and other requirements specified in 40 CFR 51 Appendix W (Guideline on Air Quality Models).*

2.3 Significant Impact Level and Cumulative NAAQS Impact Analyses

The SIL analysis for a new facility or proposed modification to a facility involves modeling estimated criteria air pollutant emissions from the facility or modification to determine the potential impacts to ambient air. Air impact analyses are required by Idaho Air Rules to be conducted according to methods outlined in Appendix W. Appendix W requires that facilities be modeled using emissions and operations representative of design capacity or as limited by a federally enforceable permit condition.

A facility or modification is considered to have a significant impact on air quality if maximum modeled impacts to ambient air exceed the established SIL listed in Idaho Air Rules Section 006 (referred to as a "significant contribution" in Idaho Air Rules) or as incorporated by reference as per Idaho Air Rules Section 107.03.b. Table 2 lists the applicable SILs.

If modeled maximum pollutant impacts to ambient air from the emissions sources associated with a new facility or modification exceed the SILs, then a cumulative NAAQS impact analysis is necessary to demonstrate compliance with NAAQS and Idaho Air Rules Section 203.02.

A cumulative NAAQS impact analysis for attainment area pollutants involves assessing impacts to ambient air (typically the design values consistent with the form of the standard) from facility-wide emissions, and emissions from any nearby co-contributing sources, and then adding a DEQ-approved background concentration value to the modeled result that is appropriate for the criteria pollutant/averaging-period at the facility location and the area of significant impact. The resulting pollutant concentrations in ambient air are then compared to the NAAQS listed in Table 2. Table 2 also lists SILs and specifies the modeled design value that must be used for comparison to the NAAQS. NAAQS compliance is evaluated on a receptor-by-receptor basis for the modeling domain.

If the cumulative NAAQS impact analysis indicates a violation of the standard, the permit may not be issued if the proposed project contributes (usually defined as impacts exceeding the SIL) to the modeled violation. This evaluation is made specific to both time and space. As an example, consider a hypothetical case where the SIL analysis indicates the project (new source or modification) has impacts exceeding the SIL and the cumulative impact analysis indicates a violation of the NAAQS. If project-specific impacts are below the SIL at the specific receptors showing the violations during the times when modeled violations occurred, then the project does not have a significant contribution to the specific violations.

Compliance with Idaho Air Rules Section 203.02 is generally demonstrated if: a) applicable specific criteria pollutant emission increases are at a level defined as BRC, using the criteria established by DEQ regulatory interpretation[1] (see Section 3.1.1 of this memorandum); or b) all modeled impacts of the SIL analysis are below the applicable SIL or other level determined to be inconsequential to NAAQS compliance; or c) modeled design values of the cumulative NAAQS impact analysis (modeling all emissions from the facility and co-contributing sources, and adding a background concentration) are less than applicable NAAQS at receptors where impacts from the proposed facility/modification exceeded the SIL or other identified level of consequence; or d) if the cumulative NAAQS analysis showed NAAQS violations, the impact of proposed facility/modification to any modeled violation was inconsequential

(typically assumed to be less than the established SIL) for that specific receptor and for the specific modeled time when the violation occurred.

Table 2. APPLICABLE REGULATORY LIMITS

Pollutant	Averaging Period	Significant Impact Levels[a] ($\mu g/m^3$)[b]	Regulatory Limit[c] ($\mu g/m^3$)	Modeled Design Value Used[d]
PM_{10}[e]	24-hour	5.0	150[f]	Maximum 6th highest[g]
$PM_{2.5}$[h]	24-hour	1.2	35[i]	Mean of maximum 8th highest[j]
	Annual	0.2	12[k]	Mean of maximum 1st highest[l]
Carbon monoxide (CO)	1-hour	2,000	40,000[m]	Maximum 2nd highest[n]
	8-hour	500	10,000[m]	Maximum 2nd highest[n]
Sulfur Dioxide (SO_2)	1-hour	3 ppb[o] (7.8 $\mu g/m^3$)	75 ppb[p] (196 $\mu g/m^3$)	Mean of maximum 4th highest[q]
	3-hour	25	1,300[m]	Maximum 2nd highest[n]
Nitrogen Dioxide (NO_2)	1-hour	4 ppb (7.5 $\mu g/m^3$)	100 ppb[r] (188 $\mu g/m^3$)	Mean of maximum 8th highest[s]
	Annual	1.0	100[t]	Maximum 1st highest[n]
Lead (Pb)	3-month[u]	NA	0.15[t]	Maximum 1st highest[n]
	Quarterly	NA	1.5[t]	Maximum 1st highest[n]
Ozone (O_3)	8-hour	40 TPY VOC[v]	70 ppb[w]	Not typically modeled

a. Idaho Air Rules Section 006 (definition for significant contribution) or as incorporated by reference as per Idaho Air Rules Section 107.03.b.
b. Micrograms per cubic meter.
c. Incorporated into Idaho Air Rules by reference, as per Idaho Air Rules Section 107.
d. The maximum 1st highest modeled value is always used for the significant impact analysis unless indicated otherwise. Modeled design values are calculated for each ambient air receptor.
e. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
f. Not to be exceeded more than once per year on average over 3 years.
g. Concentration at any modeled receptor when using five years of meteorological data.
h. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.
i. 3-year mean of the upper 98th percentile of the annual distribution of 24-hour concentrations.
j. 5-year mean of the 8th highest modeled 24-hour concentrations at the modeled receptor for each year of meteorological data modeled. For the SIL analysis, the 5-year mean of the 1st highest modeled 24-hour impacts at the modeled receptor for each year.
k. 3-year mean of annual concentration. The NAAQS was revised from 15 $\mu g/m^3$ to12 $\mu g/m^3$ on December 14, 2012. However, this standard will not be applicable for permitting purposes in Idaho until it is incorporated by reference *sine die* into Idaho Air Rules (Spring 2014).
l. 5-year mean of annual averages at the modeled receptor.
m. Not to be exceeded more than once per year.
n. Concentration at any modeled receptor.
o. Interim SIL established by EPA policy memorandum.
p. 3-year mean of the upper 99th percentile of the annual distribution of maximum daily 1-hour concentrations.
q. 5-year mean of the 4th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of 1st highest modeled 1-hour impacts for each year is used.
r. 3-year mean of the upper 98th percentile of the annual distribution of maximum daily 1-hour concentrations.
s. 5-year mean of the 8th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of maximum modeled 1-hour impacts for each year is used.
t. Not to be exceeded in any calendar year.
u. 3-month rolling average.
v. An annual emissions rate of 40 ton/year of VOCs is considered significant for O_3.
w. Annual 4th highest daily maximum 8-hour concentration averaged over three years.

2.4 Toxic Air Pollutant Analyses

Emissions of toxic substances are generally addressed by Idaho Air Rules Section 161:

Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.

Permitting requirements for TAPs from new or modified sources are specifically addressed by Idaho Air Rules Section 203.03 and require the applicant to demonstrate to the satisfaction of DEQ the following:

> *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.*

Per Section 210, if the total project-wide emissions increase of any TAP associated with a new source or modification exceeds screening emission levels (ELs) of Idaho Air Rules Section 585 or 586, then the ambient impact of the emissions increase must be estimated. If ambient impacts are less than applicable Acceptable Ambient Concentrations (AACs) for non-carcinogens of Idaho Air Rules Section 585 and Acceptable Ambient Concentrations for Carcinogens (AACCs) of Idaho Air Rules Section 586, then compliance with TAP requirements has been demonstrated.

Idaho Air Rules Section 210.15 allows an adjustment factor of 10 to be applied to the AACC or the EL for short-term sources. Section 007.11 of Idaho Air Rules defines a short-term source as a source having an operational life of no greater than five years. Since the issued permit will require that the HMA plant not remain at any location for more than 12 months, it is appropriate to apply the short-term adjustment factor for carcinogenic TAPs (with the AACC based on a 70-year exposure).

Idaho Air Rules Section 210.20 states that if TAP emissions from a specific source are regulated by the Department or EPA under 40 CFR 60, 61, or 63, then a TAP impact analysis under Section 210 is not required for that TAP. The DEQ permit writer evaluates the applicability of specific TAPs to the Section 210.20 exclusion.

3.0 Analytical Methods and Data

This section describes the methods and data used in analyses to demonstrate compliance with applicable air quality impact requirements.

3.1 Emission Source Data

Emissions of criteria pollutants and TAPs resulting from operation of the HMA plant were calculated by Spring Env and DEQ for various applicable averaging periods. A modification of DEQ's HMA plant emission calculation spreadsheet was used to calculate emissions for the facility, given the specified equipment and requested operational rates. Spring Env and DEQ air impact analyses assured that the estimated potential emissions rates were properly used in the model. The rates listed must represent the maximum allowable rate as averaged over the specified period.

Emissions rates used in the dispersion modeling analyses, as listed in this memorandum, should be reviewed by the DEQ permit writer and compared with those in the final emissions inventory used in the DEQ Statement of Basis. All modeled criteria air pollutant and TAP emissions rates must be equal to or greater than the facility's potential emissions calculated in the PTC emissions inventory or proposed permit allowable emission rates. Emission calculations are described in more detail in Attachment 1.

3.1.1 Criteria Pollutant Emissions Rates and Modeling Applicability

Exclusion of BRC Sources from NAAQS Compliance Demonstration Requirements

A criteria pollutant-specific NAAQS compliance demonstration may not be required where facility-wide potential to emit (PTE) values for that criteria pollutant would qualify for a BRC permit exemption as per Idaho Air Rules Section 221 (equal to 10 percent of the emissions defined as significant) if it were not for potential emissions of other criteria pollutants or TAPs. DEQ's regulatory interpretation policy of exemption provisions of Idaho Air Rules is that: "A DEQ NAAQS compliance assertion will not be made by the DEQ modeling group for specific criteria pollutants having a project emissions increase below BRC levels, provided the proposed project would have qualified for a Category I Exemption for BRC emissions quantities except for the emissions of another criteria pollutant.[1]" The interpretation policy also states that the exemption criteria of uncontrolled PTE not to exceed 100 ton/year (Idaho Air Rules Section 220.01.a.i) is not applicable when evaluating whether a NAAQS impact analyses is required. A permit will be issued limiting PTE below 100 ton/year, thereby negating the need to maintain calculated uncontrolled PTE under 100 ton/year.

The DEQ emission inventory asserts that facility-wide controlled PTE emissions of certain criteria pollutants are above BRC levels, as listed in Table 3. Emissions considered in this calculation are only non-fugitive emissions from the HMA plant, including: the drum dryer and loadout from the asphalt silo. Emissions from material handling of aggregate are considered fugitive, and as such were excluded from permit-applicability PTE. Emissions from the operation of IC engines powering generators were not included in permit-applicability PTE. These engines are excluded as non-road engines because they will not remain at a given site for longer than 12 months.

Table 3. CRITERIA POLLUTANT NAAQS COMPLIANCE DEMONSTRATION APPLICABILITY

Criteria Pollutant	BRC Level (ton/year)	Applicable Facility Wide PTE Emissions (ton/year)	Air Impact Analyses Required?
PM_{10} [a]	1.5	11.8	Yes
$PM_{2.5}$ [b]	1.0	11.5	Yes
Carbon Monoxide (CO)	10.0	65.7	Yes
Sulfur Dioxide (SO_2)	4.0	8.9	Yes
Nitrogen Oxides (NOx)	4.0	27.5	Yes
Lead (Pb)	0.06	0.0075	No
Ozone (as VOC)	4.0	18.0	Yes

a. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
b. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.

Table 4 lists criteria pollutant emission rates used in the DEQ site-specific impact modeling analyses for the requested operational scenario of the HMA plant. Attachment 1 provides additional details of DEQ emission calculations used in the air impact modeling analyses.

Fugitive particulate emissions from frontend loader handling of aggregate materials and three conveyor transfers were designated as volume source emissions point LOADCONV in the model. Two transfers were included for the frontend loader source: 1) transfer of aggregate from truck unloading or other transfer means to a storage pile; 2) transfer of aggregate from the storage pile to a hopper. Three transfers were included with this source for aggregate conveyors. Emissions rates for LOADCONV are a function of wind speed and were varied in the model according to wind speed. Attachment 1 provides details on these emissions calculations.

Table 4. HMA PLANT EMISSIONS USED IN DEQ ANALYSES			
Emissions Point in Model	**Pollutant**	**Averaging Period**	**Emissions Rate (lb/hr)[a]**
DRYER – asphalt drum dryer/mixer - emissions controlled by a baghouse	PM_{10}	24-hour	3.83[b]
	$PM_{2.5}$	24-hour	3.72[b]
		Annual	3.38[c]
	NOx	1-hour	22.0
		Annual	8.33[c]
	SO_2	1- and 3-hour	7.12
	CO	1- and 8-hour	52.0
GEN1 – IC engine powering secondary generator - 306 bhp, no tier certification - 24 hour/day, 4,380 hour/year	PM_{10}	24-hour	0.332[b]
	$PM_{2.5}$	24-hour	0.0750[b]
		Annual	0.0995[c]
	NOx	1-hour	9.45[d]
		Annual	6.27[c]
	SO_2	1- and 3-hour	0.0621[d]
	CO	1- and 8-hour	2.04[d]
GEN2 – IC engine powering main generator - 1,161 bhp, no tier certification - 12 hour/day, 4,380 hour/year	PM_{10}	24-hour	0.528[b]
	$PM_{2.5}$	24-hour	0.226[b]
		Annual	0.300[c]
	NOx	1-hour	26.0
		Annual	17.3[c]
	SO_2	1- and 3-hour	0.410
	CO	1- and 8-hour	6.91
SILOFILL – filling of asphalt storage silo	PM_{10}	24-hour	9.76 E-5[b] (0.0977[b,e])
	$PM_{2.5}$	24-hour	9.76 E-5[b] (0.0977[b,e])
		Annual	8.89 E-5[c] (0.0888[c,e])
	CO	1- and 8-hour	0.472[e]
LOAD – asphalt loadout from silo to truck	PM_{10}	24-hour	0.0870[b]
	$PM_{2.5}$	24-hour	0.0870[b]
		Annual	0.0791[c]
	CO	1- and 8-hour	0.540
LOADCONV – aggregate handling by frontend loader and conveyors	PM_{10}	24-hour	0.575[b,f]
	$PM_{2.5}$	24-hour	0.0871[b,f]
		Annual	0.0792[c,f]
SCREEN – scalping screen	PM_{10}	24-hour	0.139[b]
	$PM_{2.5}$	24-hour	0.00208[b]
		Annual	0.00189[c]

a. Pounds per hour emission rate used in impact modeling analyses for specified averaging periods. Values in parentheses are those used in DEQ's verification analyses, where such values differ from what was used in the analyses submitted with the application.

b. Calculated by multiplying the daily throughput or daily operational hours by the emission factor, then dividing by 24hours/day.

c. Emissions rate is equal to annual emissions divided over 6,600 hours/year (emissions were not modeled for December 1 through February 28 to account for the seasonal restriction).

d. Since the IC engines will not operate simultaneously, and the secondary engine will only operate when the HMA plant is not producing asphalt, hourly emissions from only the primary engine were modeled.

e. Value used in DEQ verification analyses. These emissions are captured and routed back to the drum dryer for control. For conservative purposes, DEQ added these emissions to those of the drum dryer (DRYER), assuming no additional control by the drum dryer.

f. Emissions are varied in the model according to wind speed category (see Attachment 1). Emissions listed are based on a 10 miles/hour (mph) wind speed.

The application indicated that emissions from asphalt silo-filling will be captured and routed back to the drum dryer. The submitted inventory for this source applied a 99.9 percent control for PM_{10} and $PM_{2.5}$ to account for the drum dryer baghouse, but then modeled the emissions from the designated silo-filling source (using the location and release parameters for the silo-filling source. DEQ has two concerns with this approach: 1) the PM_{10} and $PM_{2.5}$ emissions from silo-filling are condensable particulate and would not be controlled by a baghouse; 2) any additional emissions resulting from routing the emissions to the drum dryer would be emitted from the drum dryer baghouse stack and not emitted as a fugitive from the asphalt silo. However, these emissions are minimal compared to direct drum dryer particulate emissions and a portion of these emissions could be destroyed by the combustion process in the dryer. DEQ performed conservative verification analyses that added emissions from silo-filling to those of the drum dryer. Compliance with applicable standards and increments was still assured.

Exclusion from Impact Analyses by Modeling Thresholds

DEQ may determine that reasonably expected impacts from specific criteria pollutant emissions, for those pollutants not excluded from analysis by DEQ's regulatory interpretation policy of exemption provisions (discussed above), are so minimal that NAAQS compliance is assured without the need to perform a project-specific impact analysis. Modeling applicability threshold emission values were established to evaluate the level below which NAAQS compliance is effectively assured. These thresholds are established in the *Idaho Air Quality Modeling Guideline*[2] (https://www.deq.idaho.gov/permits/air-quality-permitting). DEQ has recently revised modeling applicability thresholds[3] and will be updating the *Idaho Air Quality Modeling Guideline*. The revisions established facility-wide thresholds based on 1/4 of regulatory Significant Emission Rates (SER) defined in Idaho Air Rules for NAAQS with annual averaging periods and (1/4)(SER)/8,760 expressed as pound/hour for NAAQS with shorter averaging periods. DEQ also revised SIL thresholds that can be used for either new facilities or facility modification projects.

Total project emissions are provided in Table 5 along with Modeling Applicability Thresholds. Emissions from co-contributing sources are not included in project modeling applicability. Because the IC engines powering generators will not remain at any single site for more than 12 months, they are considered non-road engines, are not subject to permitting, and were not considered in emission totals for comparison to modeling thresholds. Where air impact modeling was required, emissions from the IC engines were considered as co-contributing sources.

The submitted application indicated that estimated applicable emissions of CO are below DEQ Level II modeling applicability thresholds. As noted above, modeling thresholds have been revised and the 8-hour CO emissions no longer qualify for an exclusion from site-specific air impact modeling analyses. However, DEQ is still confident that compliance with the 8-hour CO NAAQS will be met given the level of emissions and the characteristics of the release of those emissions. DEQ verification analyses were performed for a limited set of meteorological datasets to demonstrate compliance with the 8-hour CO NAAQS.

Ozone (O_3) differs from other criteria pollutants in that it is not typically emitted directly into the atmosphere. O_3 is formed in the atmosphere through reactions of VOCs, NOx, and sunlight. Atmospheric dispersion models used in stationary source air permitting analyses (see Section 3.3.3) cannot be used to estimate O_3 impacts resulting from VOC and NOx emissions from an industrial facility. O_3 concentrations resulting from area-wide emissions are predicted by using more complex airshed models such as the Community Multi-Scale Air Quality (CMAQ) modeling system. Use of the CMAQ model is very resource intensive and DEQ asserts that performing a CMAQ analysis for a particular permit application is not typically a reasonable or necessary requirement for air quality permitting.

Addressing secondary formation of O_3 has been somewhat addressed in EPA regulation and policy. As stated in a letter from Gina McCarthy of EPA to Robert Ukeiley, acting on behalf of the Sierra Club (letter from Gina McCarthy, Assistant Administrator, United States Environmental Protection Agency, to Robert Ukeiley, January 4, 2012):

> *. . . footnote 1 to sections 51.166(I)(5)(I) of the EPA's regulations says the following: "No de minimis air quality level is provided for ozone. However, any net emission increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD would be required to perform an ambient impact analysis, including the gathering of air quality data."*
>
> *The EPA believes it unlikely a source emitting below these levels would contribute to such a violation of the 8-hour ozone NAAQS, but consultation with an EPA Regional Office should still be conducted in accordance with section 5.2.1.c. of Appendix W when reviewing an application for sources with emissions of these ozone precursors below 100 TPY."*

Allowable emission estimates of VOCs and NOx are below the 100 tons/year threshold, and DEQ determined it was not appropriate or necessary to require a quantitative source specific O_3 impact analysis.

Secondary Particulate Formation

The impact from secondary particulate formation resulting from emissions of NOx, SO_2, and/or VOCs was assumed by DEQ to be negligible based on the magnitude of emissions and the short distance from emissions sources to modeled receptors where maximum PM_{10} and $PM_{2.5}$ impacts would be anticipated.

Table 5. EMISSION COMPARISONS TO MODELING THRESHOLDS

Pollutant / Averaging Period	Emission Rate[a]	Facility-Wide Modeling Threshold[b]	SIL Threshold[c]	Project-Specific Air Impact Analyses Required
PM_{10}[d] 24-hour	4.7 lb/hr	0.86 lb/hr	0.32 lb/hr	Yes
$PM_{2.5}$[e] 24-hour	4.0 lb/hr	0.57 lb/hr	0.092 lb/hr	Yes
$PM_{2.5}$ annual	12.0 ton/yr	2.5 ton/yr	0.37 ton/yr	Yes
CO[f] 1-hour	53.0 lb/hr[g]	5.7 lb/hr	84 lb/hr	No
CO 8-hour	53.0 lb/hr[g]	5.7 lb/hr	26 lb/hr	Yes
NOx[g] 1-hour	22.0 lb/hr[g]	2.3 lb/hr	0.38 lb/hr	Yes
NOx annual	27.5 ton/yr[g]	10.0 ton/yr	1.9 ton/yr	Yes
SO_2 1-hour	7.1 lb/hr	2.3 lb/hr	0.40 lb/hr	Yes
SO_2 1-hour	7.1 lb/hr	2.3 lb/hr	1.0 lb/hr	Yes
VOC[h]	18 ton/yr	100 ton/yr (see below for Ozone)		No

a. Emission rate in either pounds/hour (lb/hr) or ton/year (ton/yr) over the specified time interval.
b. Revised modeling applicability thresholds[3]. Threshold based on 1/4 SER for annual NAAQS or (1/4)(SER/8,760) for shorter averaging-period NAAQS.
c. Revised modeling applicability thresholds[3]. Threshold based on the emission not causing an impact that exceeds the applicable SIL.
d. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
e. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.
f. Carbon monoxide.
g. Nitrogen oxides.
h. Volatile organic compounds regulated for ozone.

3.1.2 Toxic Air Pollutant Emissions Rates

TAP emissions regulations under Idaho Air Rules Section 220 are only applicable for new or modified sources constructed after July 1, 1995. Table 6 lists emission rates used in the TAP impact analyses performed for those TAPs with potential emissions exceeding the TAP-specific ELs or 10 times the EL for carcinogenic TAPs. Polyaromatic hydrocarbons (PAHs) are regulated by DEQ on an individual compound basis rather than a collective impact of all PAH compounds.

The application indicates that that emissions from filling of the asphalt silo are captured and routed back to the drum dryer. Once in the drum dryer, those emissions would either be destroyed by the combustion process or passed through and emitted from the baghouse stack. Spring Env modeled all TAP emissions from silo-filling from a point representative of uncaptured silo-filling emissions, rather than from the drum dryer baghouse stack. This approach is like very conservative because: 1) all or a portion of those emissions will be destroyed by combustion processes in the drum dryer; and 2) dispersion is better from the stack of the baghouse (hot, high-volume exhaust) than from an opening in the asphalt silo. DEQ verification analyses were performed using emissions from the drum dryer and silo-filling combined and released from the drum dryer baghouse.

Table 6. TAP EMISSIONS USED IN DEQ ANALYSES

TAP	Averaging Period[a]	Emissions (lb/hr)[b]		
		DRYER[c]	SILOFILL[d]	LOAD[e]
Acetaldehyde	Annual	1.96 E-1		
Benzene	Annual	5.91 E-2	5.91 E-4	3.28 E-4
Formaldehyde	Annual	4.70 E-2	1.27 E-2	5.55 E-4
POM[f]	Annual	8.30 E-5	1.02 E-4	6.97 E-5
Arsenic	Annual	8.48 E-5		
Cadmium	Annual	6.21 E-5		
Chromium 6+	Annual	6.82 E-5		
Hydrogen chloride	24-hour	8.40 E-2		
Naphthalene	24-hour	9.85 E-2[g] (2.60 E-1)	7.00 E-4[g] (1.85 E-3)	6.46 E-4[g] (1.70 E-3)
Nickle	Annual	9.54 E-3		
PAH compounds[h]				
Naphthalene	Annual	9.85 E-2	7.00 E-4	6.46 E-4

a. Maximum annual emissions are used for carcinogenic TAPs listed in Idaho Air Rules Section 586, and maximum 24-hour emissions are used for noncarcinogenic TAPs listed in Idaho Air Rules Section 585.
b. Emissions rate for carcinogenic TAPs is equal to annual emissions divided over 6,600 hours/year (emissions were not modeled for December 1 through February 28 to account for the seasonal restriction).
c. Drum dryer.
d. Filling of asphalt storage silo. These emissions are captured and routed back to the drum dryer.
e. Asphalt loadout from storage silo.
f. Polycyclic Organic Matter consisting of a group of seven polyaromatic hydrocarbons (PAHs) as listed in Idaho Air Rules Section 586.
g. Spring Env used the annual rate for short-term modeling. DEQ verification analyses were performed using the maximum hourly rate from the spreadsheet (modeled for 24 hour/day).
h. Polyaromatic hydrocarbons. PAHs are regulated on an individual PAH basis with the impact of each separate PAH compared to the PAH EL or AACC.

Naphthalene is regulated as both a non-carcinogen and a PAH carcinogen. DEQ's HMA plant emission calculation spreadsheet only provided the annual average rate on the TAPs Modeling page, so Spring Env used the same emission rate for both the 24-hour and annual TAPs modeling. DEQ performed verification analyses by modeling the maximum hourly emission rate of naphthalene continuously for 24 hour/day.

3.1.3 Emissions Release Parameters

Table 7 provides emission release parameters for the HMA plant used in the analyses, including stack height, stack diameter, exhaust temperature, and exhaust velocity. Additional details are provided in Attachment 1.

Emissions from silo-filling will be captured and routed back to the drum dryer, as indicated in the submitted application. However, Spring Env still modeled emissions from the silo-filling source. This approach likely will result in overstating impacts to a small extent.

Asphalt silo-filling and loadout were modeled as point sources, rather than volume sources, to account for thermal buoyancy of the emissions plume. Release parameters for asphalt silo-filling and loadout were based on the following:

- Release point of asphalt silo-filling was set to a typical height of a storage silo (30 feet) and the release point of asphalt loadout operations was set to correspond to the top of a truck bed.
- Release point of asphalt loadout operations was set to 11.5 feet, corresponding to the top of a truck bed.
- Stack diameter of 4.3 meters was used to approximately correspond to a typical silo. Model-calculated stack tip downwash will account for downwash affects potentially caused by the silo.
- Stack gas temperature of 346K was calculated by assuming the gas temperature would be half that of the default asphalt temperature of 325°F (1/2 of 325° F = 163° F = 346 K).
- Flow velocity of 0.1 m/sec was used to establish a reasonably conservative total flow from the source of 1,500 actual cubic feet per minute, caused by convection.

Release parameters for the IC engines were obtained from manufacturer performance data and were provided in the submitted application. Stack exhaust temperatures and flows were based on operations at 60 percent load. Release parameters for the dryer stack were obtained from data collected during a source test of the source. The parameters appeared reasonable for the source type modeled.

Fugitive sources of aggregate handling and screening were modeled as volume sources. The initial horizontal and vertical dispersion coefficients were calculated using methods outlined in the *User's Guide for the AMS/EPA Regulatory Model – AERMOD*[4] and as described in Attachment 1.

3.2 Background Concentrations

Background concentrations are used if a cumulative NAAQS impact analysis is needed to demonstrate compliance with applicable NAAQS. A background concentration tool was used to establish ambient air background concentrations for this project. The design value background concentration tool is accessed from the Northwest International Air Quality Environmental Science and Technology Consortium (NW

AIRQUEST: https://arcg.is/1jXmHH) using the location-specific coordinates. These background air pollutant levels are based on regional-scale air impact modeling of criteria pollutants in Washington, Oregon, and Idaho. The modeling was performed for years 2014-2017 using updated air pollutant emissions inventories. Modeled background values were adjusted by the tool according to available ambient monitoring data and improved interpolation techniques.

Table 7. HMA PLANT EMISSION RELEASE PARAMETERS

Release Point /Location	Source Type	Coordinates of Release Point (m)[a]	Stack Height (m)[a]	Modeled Diameter (m)[a]	Stack Gas Temp. (K)[b]	Stack Gas Flow Velocity (m/sec)[c]
DRYER	Point	0.0 E, 0.0 N	10 (33 ft)	1.37 (4.5 ft)	407 (273 °F)	16.3 (53.6 fps)
GEN1	Point	5.0 E, -5.0 N	3.5 (11.6 ft)	0.15 (0.50 ft)	802 (984 °F)	44 (144 fps)
GEN2	Point	5.0 E, 5.0 N	4.1 (13.4 ft)	0.70 (0.21 ft)	695 (792 °F)	50 (166 fps)
LOAD	Point	-5.0 E, -5.0 N	3.5 (11.5 ft)	3.0 (9.8 ft)	346 (163 °F)	0.1
SILOFILL	Point	-5.0 E, -5.0 N	9.0 (30 ft)	3.0 (9.8 ft)	346 (163 °F)	0.1
Volume Sources						
Release Point /Location	**Source Type**	**UTM Coordinates of Release Point (m)**	**Release Height (m)[a]**	**Initial Horizontal Dispersion Coefficient σ_{y0} (m)**	**Initial Vertical Dispersion Coefficient σ_{z0} (m)**	
LOADCONV	Volume	0.0 E, 0.0 N	2.5 (8.2 ft)	4.65	1.16	
SCREEN	Volume	-5.0 E, 5.0 N	3.0 (9.8 ft)	0.93	2.33	

a. Meters. Values in parentheses are in feet.
b. Kelvin. Values in parentheses are in degrees Fahrenheit.
c. Meters per second. Values in parentheses are in feet/second.
d. A value of 0 K triggers the model to set the release temperature equal to the ambient temperature in the meteorological data file for that hour modeled.

DEQ used the background concentration tool to determine design value concentrations at the following locations: Boise, Nampa, Coeur d'Alene, McCall, St. Maries, Pocatello, Soda Springs, Payette, Kamiah, Rathdrum, Lewiston, Grangeville, Star, Twin Falls, Blackfoot, Plummer, Sandpoint, Kamiah, Idaho Falls, Burley, Caldwell, and Mountain Home. The statewide background concentration for each pollutant and applicable averaging period was then determined by using the mean value of all locations plus the standard deviation. DEQ used this collection of locations to provide a reasonably conservative assessment of background concentrations for potential facility locations. More rural locations are estimated to have lower background concentrations.

The applicable DV background concentrations for these impact analyses are listed in Table 8.

3.3 Impact Modeling Methodology

This section describes the modeling methods used by DEQ to demonstrate preconstruction compliance with applicable air quality standards.

Table 8. AMBIENT BACKGROUND CONCENTRATIONS AT THE KNIFE RIVER HMA PLANT		
Pollutant	**Averaging Period**	**Background Concentration ($\mu g/m^3$)[a,b]**
$PM_{2.5}$[c]	24-hour	27.0
	Annual	7.94
PM_{10}[d]	24-hour	93.1
NO_2[e]	1-hour	71.3 (37.9 ppb[f])
	Annual	16.7 (8.86 ppb[f])
SO_2[g]	1-hour	38.6 (19.7 ppb[f])
CO[h]	8-hour	1,584 (1,426 ppb[f])

a. Micrograms per cubic meter, except where noted otherwise.
b. NW AIRQUEST ambient background lookup tool, 2014-2017.
c. Particulate matter with an aerodynamic diameter of 2.5 microns or less.
d. Particulate matter with an aerodynamic diameter of 10 microns or less.
e. Nitrogen dioxide.
f. Parts per billion by volume.
g. Sulfur dioxide.
h. Carbon monoxide.

3.3.1 General Overview of Analyses

Spring Env calculated the site-specific air pollutant emissions inventory (using the DEQ emission calculation spreadsheet for HMA plants) and performed air impact analyses. The submitted information/analyses, in combination with results from DEQ's air impact analyses, demonstrate compliance with applicable air quality standards to DEQ's satisfaction, provided the facility is operated as described in the submitted application and in this memorandum.

The ICA HMA plant is a portable facility that may locate anywhere within Idaho. Therefore, site-specific data/characteristics used in air impact analyses, such as meteorological data, site layout, and terrain, cannot be represented as accurately as can be achieved for one fixed site. This increases the uncertainty in analytical results. DEQ developed several methods to account for and offset this increased uncertainty, and these methods are described in subsequent sections of this memorandum. Modeling files and a description of the methods were provided to Spring Env to provide a template for the ICA HMA plant analyses. The general method used for the ICA HMA plant was the following:

1. Use a polar receptor grid with the emission points located at the center in a conservatively tight grouping, with the drum dryer stack at coordinate 0.0 meters E, 0.0 meters N. The first ring of receptors were established 125 meters from the drum dryer stack, representing the minimum setback requirement proposed in the application.

2. Run the model for numerous meteorological datasets, collected throughout Idaho.

3. Verify compliance with applicable NAAQS and TAP increments for each meteorological dataset.

The air impact analyses were based on the HMA plant not operating at a given site for more than 12 months, with no operations between December 1 and February 28.

Table 9 provides a brief description of parameters used in the modeling analyses.

Table 9. MODELING PARAMETERS		
Parameter	**Description/Values**	**Documentation/Addition Description**
General Facility Location	Portable in Idaho	Air impact modeling was performed to determine a setback distance needed between emission sources and the nearest point of ambient air for any location where the HMA plant may locate. The HMA plant may not locate within NAAQS non-attainment areas.
Model	AERMOD	AERMOD with the PRIME downwash algorithm, version 19191.
Meteorological Data	Multiple Areas	See Section 3.3.5 of this memorandum for additional details of the meteorological data.
Terrain	Not Considered	Flat terrain was assumed in the analyses.
Building Downwash	Considered	BPIP-PRIME was used to evaluate building/structure dimensions for consideration of downwash effects in AERMOD.
NOx chemistry	ARM2	NO to NO_2 conversion was addressed using the ARM2 method with default NO_2/NOx ratios (see Section 3.3.4).
Receptor Grid	Polar Grid	Adequate to resolve maximum modeled impacts.

3.3.2 Modeling protocol and Methodology

A modeling protocol for the project was submitted to DEQ on June 11, 2020, from Spring Env. DEQ discussed several issues/questions regarding the data and analyses during DEQ's review of the protocol. Although a formal protocol approval notice was not issued from DEQ to Spring Env, discussions and email correspondence provided agreement on proposed methods and data. Site-specific modeling was generally conducted using data and methods described in the *State of Idaho Air Quality Modeling Guideline*.[2]

3.3.3 Model Selection

Idaho Air Rules Section 202.02 requires that estimates of ambient concentrations be based on air quality models specified in 40 CFR 51, Appendix W (Guideline on Air Quality Models). The refined, steady state, multiple source, Gaussian dispersion model AERMOD was promulgated as the replacement model for ISCST3 in December 2005. AERMOD retains the single straight-line trajectory of ISCST3, but includes more advanced algorithms to assess turbulent mixing processes in the planetary boundary layer for both convective and stable stratified layers.

AERMOD version 19191 was used for the modeling analyses to evaluate impacts of the facility. This version was the current version at the time the application was received by DEQ.

3.3.4 Data and Parameters used for Modeling 1-Hour NO_2 with ARM2

The atmospheric chemistry of NO, NO_2, and O_3 complicates accurate prediction of NO_2 impacts resulting from NOx emissions. The conversion of NO to NO_2 can be conservatively addressed using several methods as outlined in a *2014 EPA NO_2 Modeling Clarification Memorandum*.[5] The guidance outlines a three-tiered approach:

- Tier 1 – assume full conversion of NO to NO_2 where total NOx emissions are modeled and modeled impacts are assumed to be 100 percent NO_2.
- Tier 2 – use an ambient ratio to adjust impacts from the Tier 1 analysis.
- Tier 3 – use a detailed screening method to account for NO/NO_2/O_3 chemistry such as the Ozone Limiting Method (OLM) or the Plume Volume Molar Ratio Method (PVMRM).

DEQ used the Ambient Ratio Method 2 (ARM2) method, a Tier 2 analysis method which assumes an ambient equilibrium between NO and NO_2, in which the conversion of NO to NO_2 is predicted using hourly ambient NOx monitoring data. ARM2 has been adopted by the EPA as a default regulatory Tier 2 option. A minimum and maximum NO_2/NOx ratio of 0.5 and 0.9, respectively, were specified in the model.

3.3.5 Meteorological Data

DEQ air impact analyses used processed meteorological data from numerous locations throughout Idaho. DEQ determined that NAAQS compliance is reasonably assured for all areas of Idaho when compliance is demonstrated by multiple analyses using the following 20 meteorological datasets: Boise, Coeur d'Alene, Grangeville, Twin Falls, Pocatello (DEQ tower in the downtown area), Pocatello airport, Idaho Falls, Rexburg, Burley, Lewiston, McCall, Spokane, Challis, Pullman/Moscow, Jerome, INL, Mountain Home, Soda Springs, Bonners Ferry, and Sandpoint. All data were processed using the option in AERMET to adjust the surface friction velocity (u*) to address AERMOD's tendency to over-predict concentrations from some sources under stable, low wind speed conditions.

3.3.6 Effects of Terrain on Modeled Impacts

Terrain effects on dispersion were not considered in the non-site-specific analyses. DEQ contends that assuming flat terrain is not a critical limitation of the analyses because most emission points associated with HMA plants are near ground-level and the immediate surrounding area is typically flat for dispersion modeling purposes. Emissions sources near ground-level typically have maximum pollutant impacts near the source, minimizing the potential effect of surrounding terrain to influence the magnitude of maximum modeled impacts. Also, other conservative assumptions and data used in the analyses will offset the potential underestimation of impacts to elevated terrain.

3.3.7 Facility Layout

DEQ's analyses for portable HMA plants use a conservative generic facility layout. This is done because the specific layout will vary depending on product needs and specific characteristics of the site and equipment. To provide conservative results, DEQ uses a tight grouping of emissions sources. Sources are positioned within about 7 meters of the center of the facility. The drum dryer stack is placed at the center of the facility and the center of the polar grid. Table 7 lists the emission point configuration used in the impact modeling analyses.

3.3.8 Effects of Building Downwash on Modeled Impacts

The housing for the primary generator (GEN2) was included in the air impact modeling analyses for downwash effects. Spring Env included the housing in the model as 4-meter square structure, 1.5 meters in height. Table 10 lists the buildings used in the air impact modeling analyses. No other substantial structures were identified in the application. Downwash effects from equipment or other minor structures at the site were not accounted for because much of the equipment is porous to wind, thereby minimizing downwash effects.

Table 10. BUILDING DIMENSIONS USED IN AIR IMPACT MODELING

Building ID and description	Horizontal Dimensions (meters)	Building Height (meters)
GEN – housing for primary generator	4.0 X 4.0	1.5

3.3.9 Ambient Air Boundary

Ambient air is defined in Section 006 of the Idaho Air Rules as "that portion of the atmosphere, external to buildings, to which the general public has access." Ambient air is typically considered as areas external to the identified property boundary where the facility is located, assuming that reasonable measures will be taken to preclude public access.

DEQ's non-site-specific analysis methods, using a generic facility layout, were used to generate minimum setback distances between key emissions points and the property boundary or the established boundary to ambient air (if not the same as the property boundary). Setback distances were specified as the distance between the stack of the drum dryer or IC engines and the closest point of potential public access. Compliance with applicable air quality standards and increments is not demonstrated unless setback distances are maintained.

3.3.10 Receptor Network

The polar grid included a total of over 2,000 receptors, provided good resolution of the maximum design value concentrations for the project, and provided extensive coverage. DEQ determined that the receptor grid used in the analyses was adequate to resolve maximum modeled impacts for the type of sources modeled.

The receptor grid used in the impact modeling analyses met the minimum recommendations specified in the *Idaho Air Quality Modeling Guideline*[2], and DEQ determined that the receptor network was effective in determining setback distances needed to reasonably assure compliance with applicable air quality standards at all ambient air locations.

3.3.11 Setback Analysis for Operations of less than One Year

Design value impacts for 1-hour NO_2, 24-hour PM_{10}, and 24-hour $PM_{2.5}$ are drivers in the determination of required setbacks. The NO_2, SO_2, and $PM_{2.5}$ standards are "probabilistic," based on three-year averages of design values. If the HMA plant will only remain at one specific location less than or equal to one year, then the design value impact will be substantially lowered because only background concentrations will be averaged with the single-year impacts.

The design value at any receptor is given by: $y = (m_1 + x_1 + x_2 + x_3) / 3$

where: m_1 = modeled design value
x_1 = background concentration occurring with modeled design value
x_2, x_3 = background concentration for years 2 and 3

A Background x_1, x_2, and x_3 value of 71.3 µg/m^3 was used for 1-hour NO_2, a value of 38.6 µg/m^3 was used for 1-hour SO_2, and a value of 27.0 µg/m^3 was used for 24-hour $PM_{2.5}$. These values represent design value background concentrations as described in Section 3.2.

The 1-hour NO_2 model results for the portable scenario were in the form of a maximum 98th percentile of daily maximum 1-hour concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant by using the following equation for NO_2:

$$y = ((m_1 + 71.3) + 71.3\ \mu g/m^3 + 71.3\ \mu g/m^3) / 3$$
$$= (m_1 + 213.9\ \mu g/m^3) / 3$$
$$= m_1 /3 + 71.3\ \mu g/m^3$$

The 1-hour SO_2 model results for the portable scenario were in the form of a maximum 99th percentile of daily maximum 1-hour concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant by using the following equation for SO_2:

$$y = ((m_1 + 38.6\ \mu g/m^3) + 38.6\ \mu g/m^3 + 38.6\ \mu g/m^3) / 3$$
$$= (m_1 + 115.8\ \mu g/m^3) / 3$$
$$= (m_1/3 + 38.6\ \mu g/m^3$$

The 24-hour $PM_{2.5}$ model results were in the form of a maximum 98th percentile of 24-hour concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant by using the following equation for $PM_{2.5}$:

$$y = ((m_1 + 27.0\ \mu g/m^3) + 27.0\ \mu g/m^3 + 27.0\ \mu g/m^3) / 3$$
$$= (m_1 + 81.0\ \mu g/m^3) / 3$$
$$= m_1/3 + 27.0\ \mu g/m^3$$

The annual $PM_{2.5}$ model results were in the form of maximum annual average concentrations for a single year. This value was converted to a design value that accounts for two additional years without operation of the HMA plant by using the following equation for $PM_{2.5}$:

$$y = (m_1 + 7.94\ \mu g/m^3 + 7.94\ \mu g/m^3 + 7.94\ \mu g/m^3) / 3$$
$$= (m_1 + 23.82\ \mu g/m^3) / 3$$
$$= m_1/3 + 7.94\ \mu g/m^3$$

Compliance with the 24-hour PM_{10} standard is based on expected exceedances of not more than once per year over a 3-year period. When modeling for 1 year of operation, this translates into a design value of the 4th highest 24-hour concentration at a specific receptor.

Carcinogenic TAP emissions may be adjusted by a Short Term (defined as no greater than 5 years) Source Factor, as specified by Idaho Air Rules Section 210.15. This section allows Carcinogenic TAP ELs or AACCs (in Idaho Air Rules Section 586) to be increased by a factor of 10.

Analyses must be performed using single-year meteorological data files when modeling for operations of not more than one year at any location, especially when results are near NAAQ. For example, when a 5-year meteorological dataset is used for modeling 1-hour NO_2 impacts, the model generates 5-year means of annual 8th-highest values of daily maximum 1-hour impacts at each receptor. If all 5 years are used in the analysis, the 5-year averaging will slightly reduce the 8th-high impact from the maximum year because of year-to-year variability. Analyses submitted by Spring Env were performed using all years of meteorological datafiles. DEQ performed verification analyses, using single-year analyses, where impacts approached applicable NAAQS.

3.3.12 Crucial HMA Plant Characteristics Affecting Air Quality Impacts

Table 11 lists characteristics of the HMA plant that are critical to the NAAQS and TAPs compliance demonstrations.

Table 11. IMPORTANT CHARACTERISTIC OF HMA PLANT USED IN DEQ ANALYSES	
Parameter	**Value or Description**
HMA Plant	
HMA Throughput Rates	400 ton/hour, 4,000 ton/day, 1,000,000 ton/year
IC Engine Powering Primary Generator	A 1,161 bhp non-Tier certified diesel engine powering the primary generator, operating a maximum of 12 hours/day and 4,380 hours/year.
IC Engine Powering Secondary Generator	A 306 bhp non-Tier certified diesel engine powering the secondary generator, operating a maximum of 24 hours/day and 4,380 hours/year.
Co-Contributing Sources	Analyses assumed there were no co-contributing emission sources within 1,000 ft of the HMA plant (distances determined from the drum dryer stack). The HMA plant will not move to a location within 1,000 ft of another permitted facility, including a CBP, rock crushing plant, or another HMA plant (see Table 1 and Section 4.2 for more details). Also, other permitted plants will not be brought onto the permittee's site within 1,000 ft of the HMA plant. The HMA plant may operate with a co-contributing rock crushing plant provided the daily throughput of the HMA plant on any day when the crusher is operated is limited to half that allowed in the permit.
Drum Dryer	Drum dryer fueled by No. 2 diesel oil, natural gas, propane, or residual fuel oil (RFO) with a sulfur content of less than 0.1 percent. A baghouse will be used for emission control.
Dryer Stack Parameters	Stack height ≥33 ft, stack diameter ≈4.5 ft (effective diameter), gas temp ≥ 273° F, flow velocity ≥54 ft/sec.
Primary IC Engine Stack Parameters	Stack height ≥14 ft, stack diameter ≈0.7 ft, gas temp ≥ 792° F, flow velocity ≥166 ft/sec.
Secondary IC Engine Stack Parameters	Stack height ≥11.6 ft, stack diameter ≈0.5 ft, gas temp ≥ 984° F, flow velocity ≥144 ft/sec.
Asphalt Silo-Filling	It was assumed that emissions are captured and routed back to the drum dryer.
Conveyor Transfers	≤3 transfers for any given quantity of material processed. Emissions controlled by 90%.
Scalping Screen	≤1 screen for any given quantity of material processed. Emissions controlled by 90%.
Frontend Loader Transfers	≤2 transfers for any given quantity of material processed. Typically involves: 1) aggregate to storage pile; 2) aggregate from pile to hopper.
Portability	The HMA plant was modeled as only a portable source, not remaining at any location for more than 12 months, with the ability to locate at any location in Idaho that is not a non-attainment area.
Seasonal Restriction	No operations from December 1 through February 28.

4.0 Impact Modeling Results

This section provides results for air impact analyses used to demonstrate compliance with applicable criteria pollutants and TAPs.

4.1 Results for Cumulative NAAQS Impact and TAP Analyses

Spring Env demonstrated NAAQS and TAP increment compliance for a 125-meter setback from the non-site-specific modeling results for each applicable averaging period and meteorological dataset. Impacts of 24-hour PM_{10} were the closest to NAAQS. DEQ verification 24-hour PM_{10} analyses results were somewhat lower that those obtained by Spring Env. The reason for these lower modeled impacts are likely that Spring Env used the 4th highest value from a 5-year meteorological data set and DEQ used the 4th highest value from a single year.

Impacts of 1-hour NO_2 also approached NAAQS, thereby elevating the importance of positioning the primary IC engine source from the ambient air boundary and maintaining a stack height of what was modeled or greater. The setback distance is the closest allowable distance between the property boundary and the stack location of either the drum dryer or the IC engine powering the primary generator. Attachment 2 provides results for all pollutants, averaging periods, and meteorological datasets.

Spring Env did not assess a scenario for operation without the IC engines. Therefore, one setback requirement will apply to the HMA plant regardless of whether the IC engines are used or not.

4.2 Locating with Other Facilities/Equipment

The air impact analyses performed by Spring Env for the portable ICA HMA plant assumed that no other permitted sources will locate on the site, except for a rock crushing plant as described below. DEQ modeling staff established a rule-of-thumb distance of 1,000 feet from emissions sources at the HMA plant where emissions from a nearby source/facility would need to be considered in the air impact modeling analyses for the HMA plant. Emissions sources located beyond 1,000 feet are considered too distant to have a measurable impact on receptors substantially impacted by the HMA plant.

HMA plants commonly operate with rock crushing plants at a given site. Since the short-term impacts are the governing criteria, simultaneous operation on an annual basis is not a large concern. DEQ air modeling staff determined NAAQS compliance is still confidently assured when a rock crushing plant locates within 1,000 feet of the HMA plant, provided the HMA plant does not operate at a daily production level of half that otherwise allowed by the permit during any day when the rock crushing plant is operating. Also, the annual actual throughput of the rock crushing plant must not exceed 500,000 tons.

Once an HMA plant is established at a site, the plant has no control over other facilities locating on neighboring properties (this does not include facilities locating on the same property as the HMA plant). Cumulative impacts would be assessed in the permitting analyses performed for the neighboring facility.

5.0 Conclusions

The ambient air impact analyses and other air quality analyses performed in support of the PTC application demonstrated to DEQ's satisfaction that emissions from the ICA HMA plant as described in this memorandum will not cause or significantly contribute to a violation of any ambient air quality standard.

References

1. *Policy on NAAQS Compliance Demonstration Requirements.* Idaho Department of Environmental Quality Policy Memorandum. July 11, 2014.

2. *State of Idaho Guideline for Performing Air Quality Impact Analyses.* Idaho Department of Environmental Quality. September 2013. State of Idaho DEQ Air Doc. ID AQ-011. Available at http://www.deq.idaho.gov/media/1029/modeling-guideline.pdf.

3. *Justification of Revised Modeling Thresholds*. Idaho Department of Environmental Quality. Memorandum from Kevin Schilling, Air Quality Dispersion Modeling Supervisor, to Michael Simon, Stationary Source Bureau Chief. January 14, 2020.

4. *User's Guide for the AMS/EPA Regulatory Model – AERMOD*. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Emissions Monitoring and Analysis Division. EPA-454/B-03-001. September 2004. (Section 3.3.2.2).

5. *Clarification on the Use of AERMOD Dispersion Modeling for Demonstrating Compliance with the NO_2 National Ambient Air Quality Standard.* U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Air Quality Modeling Group. Memorandum from R. Chris Owen and Roger Brode, to Regional Dispersion Modeling Contacts. September 30, 2014.

ATTACHMENT 1

EMISSIONS CALCULATIONS AND MODELING PARAMETERS FOR

DEQ'S AIR IMPACT ANALYSES

HMA Plant Modeled Emissions Rates

Compliance determination is linked to throughput levels and the equipment configuration at the site.

Emissions from Drum Dryer, Asphalt Loadout, and Asphalt Silo Filling

DEQ's HMA plant spreadsheet to calculate emissions rates for various averaging periods.

Aggregate Handling Emissions

Emissions from aggregate handling were calculated for the following transfers: 1) aggregate to a storage pile by frontend loader; 2) aggregate from a pile to a hopper by frontend loader; 3) three conveyor transfers.

PM_{10} and $PM_{2.5}$ emissions associated with the handling of aggregate materials were calculated using emissions factors from AP42 Section 13.2.4.

Emissions were calculated using the following emissions equation:

$$E = k(0.0032)\left[\frac{(U/5)^{1.3}}{(M/2)^{1.4}}\right] \quad \text{lb/ton}$$

Where:

k = 0.053 for $PM_{2.5}$, 0.35 for PM_{10}
M = 3% for aggregate
U = wind speed (mph)

A moisture content of 3% to 7% was estimated as a typical moisture content of aggregate entering the dryer, per STAPPA-ALAPCO-EPA, Emission Inventory Improvement Program, Volume II, Chapter 3, Preferred and Alternative Methods for Estimating Air Emissions from Hot Mix Asphalt Plants, Final Report, July 1996. An additional 90% emissions control was applied to calculated emissions from the conveyor transfers to account for additional emissions control measures required by Idaho regulations and the permit.

In the model, emissions are varied as a function of windspeed, with the base emissions entered for a windspeed of 10 mph.

upper windspeeds for 6 categories: 1.54, 3.09, 5.14, 8.23, 10.8 m/sec

Median windspeed for each category (1 m/sec = 2.237 mph)

Cat 1: (0 + 1.54)/2 = 0.77 m/sec ➢ 1.72 mph
Cat 2: (1.54 + 3.09)/2 = 2.32 m/sec ➢ 5.18 mph
Cat 3: (3.09 + 5.14)/2 = 4.12 m/sec ➢ 9.20 mph
Cat 4: (5.14 + 8.23)/2 = 6.69 m/sec ➢ 14.95 mph
Cat 5: (8.23 + 10.8)/2 = 9.52 m/sec ➢ 21.28 mph
Cat 6: (10.8 + 14)/2 = 12.4 m/sec ➢ 27.74 mph

Base $PM_{2.5}$ factor – use 10 mph wind: $0.053\ (0.0032)\frac{(10/5)^{1.3}}{(3/2)^{1.4}} = 2.367\text{ E-4}$ lb/ton

Base PM_{10} factor – use 10 mph wind: $0.35\ (0.0032)\frac{(10/5)^{1.3}}{(3/2)^{1.4}} = 1.563\text{ E-3}$ lb/ton

Adjustment factors to put in the model:

Cat 1: $(1.72/5)^{1.3}$ (4.702 E-5) = 1.174 E-5 lb/ton
Factor = 1.174 E-5/1.158 E-4 = 0.1014

Cat 2: $(5.18/5)^{1.3}$ (4.702 E-5) = 4.923 E-5 lb/ton
Factor = 4.923 E-5 /1.158 E-4 = 0.4253

Cat 3: $(9.20/5)^{1.3}$ (4.702 E-5) = 1.039 E-4 lb/ton
Factor = 1.039 E-4/1.158 E-4 = 0.8974

Cat 4: $(14.95/5)^{1.3}$ (4.702 E-5) = 1.953 E-4 lb/ton
Factor = 1.953 E-4/1.158 E-4 = 1.687

Cat 5: $(21.28/5)^{1.3}$ (4.702 E-5) = 3.090 E-4 lb/ton
Factor = 3.090 E-4/1.158 E-4 = 2.669

Cat 6: $(27.74/5)^{1.3}$ (4.702 E-5) = 4.362 E-4 lb/ton
Factor = 4.362 E-4/1.158 E-4 = 3.768

For the operational scenario for 4,000 ton/day HMA and 1,000,000 ton/year HMA, emissions from the loader are as follows (daily and annual throughputs were based on aggregate being 96% of the total HMA production):

Daily $PM_{2.5}$:

$$\frac{2.367\text{ E-4 lb } PM_{2.5}}{\text{Ton}} \left| \frac{3{,}840\text{ ton}}{\text{day}} \right| \frac{\text{day}}{24\text{ hr}} \left| \frac{2\text{ transfers}}{} \right. = \frac{0.07574\text{ lb}}{\text{hr}}$$

Annual $PM_{2.5}$:

$$\frac{2.367\text{ E-4 lb } PM_{2.5}}{\text{Ton}} \left| \frac{960{,}000\text{ ton}}{\text{yr}} \right| \frac{\text{yr}}{6{,}600\text{ hour}} \left| \frac{2\text{ transfers}}{} \right. = \frac{0.06886\text{ lb}}{\text{hr}}$$

Emissions from the three conveyor transfers are as follows (with an additional 90% control):

Daily $PM_{2.5}$:

$$\frac{2.367\text{ E-4 lb } PM_{2.5}}{\text{Ton}} \left| \frac{3{,}840\text{ ton}}{\text{day}} \right| \frac{\text{day}}{24\text{ hr}} \left| \frac{3\text{ transfers}}{} \right| \frac{(1\text{-}0.90)}{} = \frac{0.01136\text{ lb}}{\text{hr}}$$

Annual $PM_{2.5}$:

$$\frac{2.367\text{ E-4 lb } PM_{2.5}}{\text{ton}} \left| \frac{960{,}000\text{ ton}}{\text{yr}} \right| \frac{\text{yr}}{6{,}600\text{ hour}} \left| \frac{3\text{ transfers}}{} \right| \frac{(1\text{-}0.90)}{} = \frac{0.01033\text{ lb}}{\text{hr}}$$

Screening Emissions

This HMA plant uses one scalping screen. A $PM_{2.5}$ factor for uncontrolled emissions was not available in AP42. A $PM_{2.5}$ factor was estimated by DEQ permit writers and entered into the HMA calculation spreadsheet. The uncontrolled emissions factor was used and a 15% reduction applied to calculated emissions to account for additional emissions control measures required by Idaho regulations and the permit.

Daily and annual throughputs were based on aggregate being 96% of the total HMA production.

For the operational scenario for 4,000 ton/day HMA and 1,000,000 ton/year HMA, emissions are as follows:

Scalping Screen (controlled emissions):

Daily $PM_{2.5}$:

$$\frac{0.000130 \text{ lb } PM_{2.5}}{\text{ton}} \left| \frac{3{,}840 \text{ ton}}{\text{day}} \right| \frac{\text{day}}{24 \text{ hour}} \left| (1\text{-}0.90) \right| = \frac{0.002080 \text{ lb}}{\text{hour}}$$

Annual $PM_{2.5}$:

$$\frac{0.000130 \text{ lb } PM_{2.5}}{\text{ton}} \left| \frac{960{,}000 \text{ ton}}{\text{year}} \right| \frac{\text{year}}{6{,}600 \text{ hour}} \left| (1\text{-}0.90) \right| = \frac{0.001890 \text{ lb}}{\text{hour}}$$

HMA Plant Modeling Parameters

Dryer baghouse Stack

Release height = 10.1 meters; effective diameter of release area = 1.4 meters;
typical stack gas temperature = 407 K; typical flow velocity = 16.3 meters/second

Asphalt Silo-Filling

The application stated that emissions from silo filling will be captured and routed back into the drum dryer. However, Spring Env modeled estimated emissions from a point representative of an uncontrolled silo-filling source. DEQ added silo-filling emissions to those normally calculated for the drum dryer and modeled them with characteristics of the drum dryer baghouse stack.

Spring Env modeled this source as a point source.
- release height of 10.7 meters
- stack diameter of 4.3 meters, corresponding to the approximate diameter of the silo.
- gas temperature was estimated at half the AP42 default asphalt temperature: 325° F / 2 = 163° F (346 K)
- stack velocity of 0.1 m/sec to account for convective air flow.

Asphalt Loadout

Spring Env and DEQ modeled this source as a point source.
- release height of 3.5 meters
- stack diameter of 4.3 meters, corresponding to the approximate diameter of the silo.
- gas temperature was estimated at half the AP42 default asphalt temperature: 325° F / 2 = 163° F (346 K)
- stack velocity of 0.1 m/sec to account for convective air flow.

Aggregate to Storage/Hoppers and Transfer by Conveyors

Release emissions in model from a 20 m X 20 m area 5 m high, released at 3.0 m

Initial dispersion coefficients:

σ_{y0} = 20 m / 4.3 = 4.65 m
σ_{z0} = 5 m / 4.3 = 1.16 m

Sources include: two frontend loader transfers, from the point of aggregate delivery to transfer to the HMA plant hopper, and multiple conveyor transfers.

Scalping Screen

This source was modeled as a single volume source on or adjacent to a structure 10 m X 4 m, 5.0 meters thick, with a release height of 3.0 meters. The initial dispersion coefficients are calculated as follows:

σ_{yo} = 4 m / 4.3 = 0.93 m
σ_{zo} = 5 m / 2.15 = 2.33 m

ATTACHMENT 2

MODELED IMPACTS TO AMBIENT AIR

USING 125-METER SETBACK

Modeled Impacts for Specific Pollutants, Averaging Periods, and Meteorological Datasets	
NO_2 1-hour Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 400 ton/hour production Modeled Design Value with Background (µg/m^3) – NAAQS = 188 µg/m^3**
Boise	166
Bonners Ferry	142
Burley	180 (DEQ: 2018=181; 2017=183; 2016= 180; 2015=181; 2014=182)
Challis	161
Coeur d'Alene	167
Grangeville	153
Idaho Falls	172
INL/Grid3 Mesowest site	155
Jerome	176 (DEQ: 2018=176; 2017=179; 2016=177; 2015=176; 2014=180)
Lewiston	164
McCall	153
Moscow	174
Mountain Home	158
Pocatello Airport	163
Pocatello (DEQ tower)	140
Rexburg	172
Sandpoint	157
Soda Springs (P4 Rambol data)	151
Spokane	182 (DEQ: 2015=181; 2014=182; 2013=180)
Twin Falls	173

SO_2 1-hour Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 400 ton/hour production Modeled Design Value with Background (µg/m^3) – NAAQS = 196 µg/m^3**
Boise	32.3
Bonners Ferry	31.7
Burley	29.4 (DEQ: 2018=29.7; 2017=30.0)
Challis	29.4
Coeur d'Alene	29.0
Grangeville	33.1
Idaho Falls	34.7
INL/Grid3 Mesowest site	34.5
Jerome	34.3
Lewiston	29.9
McCall	32.2
Moscow	32.3
Mountain Home	34.9
Pocatello Airport	34.8
Pocatello (DEQ tower)	33.9
Rexburg	32.6
Sandpoint	30.7
Soda Springs (P4 Rambol data)	34.2
Spokane	31.1
Twin Falls	34.5

a. Modeled as a portable facility, not remaining at any site for more than 12 months. Design value impacts were calculated from model output using the methods described in Section 3.3.11. For impacts closest to NAAQS, the analysis was followed with DEQ analyses for 1-year operations using each individual year of meteorological data.

b. Values in parentheses are those obtained from DEQ's single-year analyses.

Modeled Impacts for Specific Pollutants, Averaging Periods, and Meteorological Datasets	
CO 8-hour Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 400 ton/hour production Modeled Design Value with Background (µg/m^3) – NAAQS = 10,000 µg/m^3**
Boise	
Bonners Ferry	
Burley	(DEQ: 2014-2018=1,792)
Challis	
Coeur d'Alene	
Grangeville	
Idaho Falls	
INL/Grid3 Mesowest site	
Jerome	(DEQ: 2014-2018=1,900)
Lewiston	
McCall	
Moscow	(DEQ:2014-2018=1979)
Mountain Home	
Pocatello Airport	
Pocatello (DEQ tower)	
Rexburg	
Sandpoint	
Soda Springs (P4 Rambol data)	
Spokane	(DEQ: 2012-2016=1,821)
Twin Falls	

a. Modeled as a portable facility, not remaining at any site for more than 12 months. Design value impacts were calculated from model output using the methods described in Section 3.3.11. For impacts closest to NAAQS, the analysis was followed with DEQ analyses for 1-year operations using each individual year of meteorological data.

b. Values in parentheses are those obtained from DEQ's single-year analyses.

Modeled Impacts for Specific Pollutants, Averaging Periods, and Meteorological Datasets

PM_{10} 24-hour Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 4,000 ton/day production Modeled Design Value with Background (µg/m^3) – NAAQS = 150 µg/m^3**
Boise	130
Bonners Ferry	131
Burley	138
Challis	122
Coeur d'Alene	147 (DEQ: 2018=135)
Grangeville	121
Idaho Falls	131
INL/Grid3 Mesowest site	119
Jerome	137
Lewiston	117
McCall	119
Moscow	146 (DEQ: 2018=137; 2017=139)
Mountain Home	124
Pocatello Airport	123
Pocatello (DEQ tower)	115
Rexburg	140 (DEQ: 2018=132; 2017=135)
Sandpoint	146
Soda Springs (P4 Rambol data)	142
Spokane	141
Twin Falls	123

$PM_{2.5}$ 24-hour Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 4,000 ton/hour production Modeled Design Value with Background (µg/m^3) – NAAQS = 35 µg/m^3**
Boise	30
Bonners Ferry	28
Burley	30
Challis	28
Coeur d'Alene	30 (DEQ: 2018=30)
Grangeville	29
Idaho Falls	30
INL/Grid3 Mesowest site	30
Jerome	30
Lewiston	28
McCall	29
Moscow	30 (DEQ: 2018=30; 2017=31)
Mountain Home	30
Pocatello Airport	30
Pocatello (DEQ tower)	30
Rexburg	30 (DEQ: 2018=30; 2017=30)
Sandpoint	30
Soda Springs (P4 Rambol data)	30
Spokane	30
Twin Falls	30

a. Modeled as a portable facility, not remaining at any site for more than 12 months. Design value impacts were calculated from model output using the methods described in Section 3.3.11. For impacts closest to NAAQS, the analysis was followed with DEQ analyses for 1-year operations using each individual year of meteorological data.

b. Values in parentheses are those obtained from DEQ's single-year analyses.

Modeled Impacts for Specific Pollutants, Averaging Periods, and Meteorological Datasets

$PM_{2.5}$ annual Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 1,000,000 ton/year production Modeled Design Value with Background (µg/m^3) – NAAQS = 12 µg/m^3**
Boise	9.0
Bonners Ferry	8.4
Burley	8.9
Challis	8.5
Coeur d'Alene	8.9
Grangeville	8.5
Idaho Falls	9.2 (DEQ: 2018=9.3; 2017=9.2; 2016=9.1)
INL/Grid3 Mesowest site	8.9
Jerome	8.9
Lewiston	8.4
McCall	8.4
Moscow	8.9
Mountain Home	9.0
Pocatello Airport	9.0
Pocatello (DEQ tower)	8.7
Rexburg	9.1
Sandpoint	8.7
Soda Springs (P4 Rambol data)	8.9
Spokane	8.9
Twin Falls	9.0

NO_2 Annual Modeling Results[a]	
Meteorological Data	**Impacts with 125-Meter Setback[b] 1,000,000 ton/hour production Modeled Design Value with Background (µg/m^3) – NAAQS = 100 µg/m^3**
Boise	43
Bonners Ferry	32
Burley	45
Challis	28
Coeur d'Alene	33
Grangeville	32
Idaho Falls	59 (DEQ: 2018=64.7; 2017=60.9; 2016=58.0)
INL/Grid3 Mesowest site	51
Jerome	45
Lewiston	31
McCall	33
Moscow	43
Mountain Home	53
Pocatello Airport	52
Pocatello (DEQ tower)	48
Rexburg	50
Sandpoint	32
Soda Springs (P4 Rambol data)	35
Spokane	42
Twin Falls	58

a. Modeled as a portable facility, not remaining at any site for more than 12 months. Design value impacts were calculated from model output using the methods described in Section 3.3.11. For impacts closest to NAAQS, the analysis was followed with DEQ analyses for 1-year operations using each individual year of meteorological data.

b. Values in parentheses are those obtained from DEQ's single-year analyses.

Modeled Impacts for Specific Pollutants, Averaging Periods, and Meteorological Datasets

TAPs Modeled and Meteorological Dataset Showing Highest Impacts	Impacts with 125-Meter Setback[a] 1,000,000 ton/year production (µg/m^3)
Acetaldehyde AACC X 10 = 4.5 E-0 µg/m^3	
INL/Grid3 Mesowest site	6.93 E-2 (6.93 E-2)
Arsenic AACC X 10 = 2.3 E-3 µg/m^3	
INL/Grid3 Mesowest site	2.98 E-5
Benzene (AACC X 10 = 1.2 E-0 µg/m^3	
INL/Grid3 Mesowest site	2.33 E-2 (2.18 E-2)
Cadmium AACC X 10 = 5.6 E-3 µg/m^3	
INL/Grid3 Mesowest site	2.18 E-5
Chromium 6+ AACC X 10 = 8.3 E-3 µg/m^3	
INL/Grid3 Mesowest site	2.40 E-5
Formaldehyde AACC X 10 = 7.7 E-1 µg/m^3	
INL/Grid3 Mesowest site	2.04 E-1 (2.25 E-2)
Hydrogen Chloride AAC = 375 µg/m^3	
INL/Grid3 Mesowest site	0.335 (0.335)
Naphthalene AAC = 2,500 µg/m^3	
INL/Grid3 Mesowest site	0.400 (1.05)
Nickle AACC X 10 = 4.2 E-2 µg/m^3	
INL/Grid3 Mesowest site	3.36 E-3 (3.36 E-3)
POM AACC X 10 = 3.0 E-3 µg/m^3	
Rexburg	1.94 E-3 (2.9 E-4)
Polyaromatic Hydrocardon (PAH) Compounds	
Naphthalene (PAH) AACC X 10 = 1.4 E-1 µg/m^3	
INL/Grid3 Mesowest site	3.83 E-2 (3.65 E-2)

a. Values in parentheses are results from DEQ's analyses. Values are lower from DEQ's analyses for some TAPs because emissions from the drum dryer had emissions from silo loading added to them (since those emissions are routed back to the dryer), whereas Spring Env modeled these emissions from a point representative of silo-filling.

APPENDIX C – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

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:	**Interstate Concrete & Asphalt - 00624**
Address:	**Portable**
City:	**Spokane**
State:	**WA**
Zip Code:	**99220**
Facility Contact:	**Jeremiah Lemons**
Title:	**Vice President**
AIRS No.:	**777-00624**

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)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO_X	27.5	0	27.5
SO_2	8.9	0	8.9
CO	66.3	0	66.3
PM10	11.8	0	11.8
VOC	18.0	0	18.0
Total:	0.0	0	**132.4**
Fee Due	**$ 7,500.00**		

Comments: This project was submitted as a standard permit, instead of the general permit format for HMA's. This allowed some flexibility for the facility in their analysis but that means they don't pay the general permit processing fee and are subject to DEQ's processing fee determination through emission increases.

APPENDIX D – FACILITY DRAFT COMMENTS

The following comments were received from the facility on May 14, 2021:

Facility Comment: Condition 2.5 – consider replacing 12-months with 365 days to provide greatest operational flexibility.

DEQ Response: The Idaho rules, DEQ forms and guidance, and general permit documents utilize the "12-months" language for portable facilities. Therefore, for consistency, DEQ will not change this condition with 365 days.

Facility Comment: Condition 3.8 – change "or" to "and/or" – this will allow a combination of those listed materials. Hot mix asphalt is typically compromised of a combination of those products, not just one.

DEQ Response: The language in permit condition 3.8 was updated to reflect this comment.

Facility Comment: Condition 5.5 and 5.6 – these conditions appear to use language for a stationary source. Please update language to be consistent with a portable source.

DEQ Response: These conditions are standard and included in every permit to construct, stationary or portable. DEQ believes that the use of the term "facility" is adequate language to include portable sources.

Facility Comment: In the statement of basis: Page 8 - The requested annual throughput multiplied by 4 (4,000,000 T/yr) is greater than the potential throughput of 400T/hr x 8760 hrs/yr (3,504,000 T/yr). This does not change the scope of the project, but does affect PTE emissions in Tables 2 and 3

DEQ Response: The uncontrolled potential to emit analysis was updated with a more realistic throughput.