Statement of Basis

Permit to Construct No. P-2012.0005
Project ID 60992

CPM Development Corp. 00225
Portable HMA Plant, Idaho

Facility ID 777-00225

Facility Review

April 18, 2012
Ken Hanna
Permit Writer

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

acfm actual cubic feet per minute
ASTM American Society for Testing and Materials
Btu British thermal units
CEMS continuous emission monitoring systems
cfm cubic feet per minute
CFR Code of Federal Regulations
CI compression ignition
CO carbon monoxide
DEQ Department of Environmental Quality
dscf dry standard cubic feet
dscm dry standard cubic meter
EPA U.S. Environmental Protection Agency
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
lb/hr pounds per hour
MACT Maximum Achievable Control Technology
mg/dscm milligrams per dry standard cubic meter
MMBtu million British thermal units
NAAQS National Ambient Air Quality Standard
NESHAP National Emission Standards for Hazardous Air Pollutants
NO₂ nitrogen dioxide
NOₓ nitrogen oxides
NSPS New Source Performance Standards
O&M operation and maintenance
PERF Portable Equipment Relocation Form
PM particulate matter
PM₁₀ particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm parts per million
PSD Prevention of Significant Deterioration
PTC permit to construct
PTE potential to emit
RAP recycled asphalt pavement
RICE reciprocating internal combustion engines
Rules Rules for the Control of Air Pollution in Idaho
SM synthetic minor
SO₂ sulfur dioxide
SOₓ 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
VOC volatile organic compounds
μg/m³ micrograms per cubic meter
FACILITY INFORMATION

Description
The asphalt plant uses a front-end loader to transfer stockpiled aggregate to five cold feed bins. Aggregate is dispensed from the bins onto slow moving feeder conveyors, sorted by a scalping screen for proportioned size gradations, and finally introduced to a drum mix dryer. Aggregate travels through the rotating drum counter-current to the heating media. The material is then heated and dried and mixed with liquid asphalt cement. The resulting hot mix asphalt (HMA) is then conveyed to hot storage bins until it can be loaded into dump trucks for transport off site. Recycled asphalt pavement (RAP) can be substituted in equal amounts for aggregate. The RAP process includes an additional bin, a lump breaker, and two conveyors. The plant uses natural gas, propane, fuel oil, and used oil as fuel for the asphalt plant dryer. Emissions from the dryer are controlled with a baghouse.

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

April 20, 2012  PTC No. P-2012.0005, PROJ 60992; PTC issued to change the facility name to CPM Development Corp and for replacement of the dryer drum; Permit status (A)

June 28, 2004  PTC No. P-040105; PTC adds use of recycled asphalt pavement (RAP) and used oil and fuel oil for use as fuels in addition to natural gas and propane/LPG; facility name change also; Permit status (S)

February 18, 2000  PTC No. 777-00225 for hot-mix asphalt plant including collocation with one other portable source (i.e., rock crusher, hot-mix asphalt plant, or concrete batch plant); Permit status (S)

August 14, 1998  PTC No. 777-00225 for hot-mix asphalt plant; Permit status (S)

Application Scope
This PTC is for a minor modification at an existing minor facility.
The applicant has proposed to:
- Change the permittee name to CPM Development Corporation;
- Replace the existing 350 tons per hour drum mix dryer and baghouse with a new drum mix dryer rated at 400 tons per hour, and new baghouse. CPM Development Corp. has requested to keep all currently permitted operating restrictions on production so that no increase in emissions occurs.

Application Chronology
February 2, 2012  DEQ received an application and an application fee.
March 2, 2012  DEQ determined that the application was complete.
March 30, 2012  DEQ made available the draft permit and statement of basis for peer and regional office review.
April 16, 2012  DEQ made available the draft permit and statement of basis for applicant review.
April 18, 2012  DEQ received the permit processing fee.
## TECHNICAL ANALYSIS

### Emissions Units and Control Equipment

<table>
<thead>
<tr>
<th>Sources</th>
<th>Control Equipment</th>
<th>Emission Point ID No.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Emissions Unit Name:</strong> Gencor Drum Dryer</td>
<td><strong>Control Device Name:</strong> Baghouse</td>
<td><strong>Exit height:</strong> 33 ft (10.1 m)</td>
</tr>
<tr>
<td>Manufacturer: Gencor</td>
<td>Manufacturer: Gencor Industries</td>
<td><strong>Exit diameter:</strong> 44 in (1.12 m)</td>
</tr>
<tr>
<td>Model: Ultradrum 400 TPH</td>
<td>Model: CFP-182</td>
<td><strong>Exit flow rate:</strong> 44,000 acfm</td>
</tr>
<tr>
<td>Manufacture Date: 2011</td>
<td>PM$_{10}$ control efficiency: 99.90%</td>
<td><strong>Exit temperature:</strong> 300°F (149°C)</td>
</tr>
<tr>
<td>Max. production: Rated capacity is 400 TPH but permit limits it to 350 T/hr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuel: Natural gas, propane, used oil, and fuel oil</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max. drum burner heat input: 130 MMBtu/hr when fired on natural gas, based on a 24-hour average</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max. drum burner fuel consumption: 130 MMBtu/hr when fired on natural gas, based on a 24-hour average</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Asphaltic Oil Tank Heater:</strong></td>
<td><strong>None</strong></td>
<td><strong>Exit height:</strong> 11.5 ft (3.51 m)</td>
</tr>
<tr>
<td>Manufacturer: CEI</td>
<td></td>
<td><strong>Exit diameter:</strong> 11 in (0.28 m)</td>
</tr>
<tr>
<td>Model: 30-hoh-tms1500</td>
<td></td>
<td><strong>Exit temperature:</strong> 375°F (191°C)</td>
</tr>
<tr>
<td>Rated heat input: 0.77 MMBtu/hr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuel: distillate fuel oil</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>600 kW Diesel Generator:</strong></td>
<td><strong>None</strong></td>
<td><strong>Exit height:</strong> 16 ft (4.88 m)</td>
</tr>
<tr>
<td>Manufacturer: Caterpillar</td>
<td></td>
<td><strong>Exit diameter:</strong> 6 in (0.15 m)</td>
</tr>
<tr>
<td>Model: 3412</td>
<td></td>
<td><strong>Exit flow rate:</strong> 1414 acfm</td>
</tr>
<tr>
<td>Manufacture Date: 2001</td>
<td></td>
<td><strong>Exit temperature:</strong> 800°F (427°C)</td>
</tr>
<tr>
<td>Max rated horsepower: 750</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operations: 24 hr/day; 1800 hr/yr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EPA Rating/Tier No.: none</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuel: Distillate fuel oil</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>75 kW Diesel Generator:</strong></td>
<td><strong>None</strong></td>
<td><strong>Exit height:</strong> 4.5 ft (1.22 m)</td>
</tr>
<tr>
<td>Manufacturer: Perkins</td>
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<td><strong>Exit diameter:</strong> 2.5 in (0.064 m)</td>
</tr>
<tr>
<td>Model: 75</td>
<td></td>
<td><strong>Exit flow rate:</strong> 245 acfm</td>
</tr>
<tr>
<td>Manufacture Date: 1991</td>
<td></td>
<td><strong>Exit temperature:</strong> 800°F (427°C)</td>
</tr>
<tr>
<td>Max rated horsepower: 50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operations: 24 hr/day; 4000 hr/yr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EPA Rating/Tier No.: none</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fuel: Distillate fuel oil</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Emissions Inventories

For this project to replace the existing 350 tons per hour drum mix dryer and baghouse with a new drum mix dryer rated at 400 tons per hour, and new baghouse, CPM Development Corp. has requested to keep all currently permitted operating restrictions on production so that no increase in emissions occurs. Therefore, the emission limits and operating limits have not been increased in the revised permit, and an additional short term operating limit was added to make the limit on short term emissions enforceable as a practical matter. Refer to the Statement of Basis for the previously issued permit (PTC No. P-040105 issued on June 28, 2004) for details of the emissions from this facility.
**Ambient Air Quality Impact Analyses**

This permit revision will not result in an increase in allowable emissions. Therefore, there will be no emission increases above modeling thresholds so modeling is not required for this project. Refer to the Statement of Basis for the previously issued permit (PTC No. P-040105 issued on June 28, 2004) for details of the ambient air impact analyses performed for this facility.

**REGULATORY ANALYSIS**

The regulatory analysis for this facility is not changed by this project to replace the drum dryer. The information from the previous Statement of Basis is reprinted below, in the most current format, for continuity purposes.

**Attainment Designation (40 CFR 81.313)**

The facility is classified as a portable plant. Ambient air quality modeling conducted by the DEQ for a previous permit resulted in greater than significant PM$_{10}$ concentrations in nonattainment areas. As a result, for that permit the permittee opted for a permit condition which would limit operations in nonattainment areas to “grid” or “line” power. Modeling for “line” (no generator use) power resulted in less than significant PM$_{10}$ emissions from the facility, and allows operations in nonattainment areas.

**Facility Classification**

As described in the Statement of Basis for the previous permit (PTC No. P-040105 issued on June 28, 2004), this facility is classified as a “Synthetic Minor” facility. This facility classification is not changed for this project since the allowable emissions are not changed.

**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 replacement of the drum dryer on the hot mix asphalt plant. Therefore, a permit to construct is 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 addressed by Permit Condition 10.

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

IDAPA 58.01.01.301 ......................................Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM$_{10}$, SO$_2$, NO$_x$, CO and VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Based on review of similar hot-mix asphalt plants, it was confirmed that greenhouse gas emissions estimates would also be below the major source thresholds. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.
**PSD Classification (40 CFR 52.21)**

40 CFR 52.21 .......................................................Prevention of Significant Deterioration of Air Quality

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

**NSPS Applicability (40 CFR 60)**

Since the previous permit was issued, EPA has issued new regulations for internal combustion compression ignition engines under Subpart III; refer to the new information below. NSPS applicability under Subpart I does not change as a result of this project. Following is a copy of the Subpart I applicability determination included in the Statement of Basis for the previously issued permit (PTC No. P-040105 issued on June 28, 2004).

**NSPS Subpart III**

40 CFR 60, Subpart III........................................Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 CFR 60.4200....................................................Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:

(i) 2007 or later, for engines that are not fire pump engines,

(ii) The model year listed in table 3 to this subpart or later model year, for fire pump engines.

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005 where the stationary CI ICE are:

(i) Manufactured after April 1, 2006 and are not fire pump engines, or

(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

(3) Owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005.

(4) The provisions of 40 CFR 60.4208 are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005.

Because commencement of construction (the date the engine is ordered) of the two generator set engines used at this facility was prior to July 11, 2005, the requirements of Subpart III do not apply.

**40 CFR 60 Subpart I Standards of Performance for Hot Mix Asphalt Facilities**

Part 60 of Title 40 (Protection of the Environment) of the Code of Federal Regulations, also known as New Source Performance Standards (NSPS), imposes standards of performance on facilities constructed or modified after that source category's applicability date. With respect to PM, NSPS sets the particulate emission standard at 0.04 gr/dscf, the visible emission standard at 20% opacity, and the Reference Method tests (RM 5 and 9, respectively) for evaluating compliance with those standards. The source category applicability date is June 11, 1973. Subpart I is reprinted below.
§ 60.90 Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each hot mix asphalt facility. For the purpose of this subpart, a hot mix asphalt facility is comprised only of any combination of the following: dryers; 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.

(b) Any facility under paragraph (a) of this section that commences construction or modification after June 11, 1973, is subject to the requirements of this subpart.

§ 60.91 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) Hot mix asphalt facility means any facility, as described in § 60.90, used to manufacture hot mix asphalt by heating and drying aggregate and mixing with asphalt cements.

§ 60.92 Standard for particulate matter.

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall discharge or cause the discharge into the atmosphere from any affected facility any gases which:

(1) Contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf).

(2) Exhibit 20 percent opacity, or greater.

§ 60.93 Test methods and procedures.

(a) In conducting the performance tests required in § 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in § 60.8(b).

(b) The owner or operator shall determine compliance with the particulate matter standards in § 60.92 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).

(2) Method 9 and the procedures in § 60.11 shall be used to determine opacity.

40 CFR 279 .................................................. Standards for the Management of Used Oil

The following text is reprinted from the Statement of Basis for the previous permit; this information has not changed. Part 279.11 contains specifications for used oil which include minimum flash point temperature and allowable concentrations for arsenic, cadmium, chromium, lead, and total halogens. The limit for total halogens is listed at 4,000 ppm maximum. However, used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under § 279.10(b)(1). Such used oil is subject to subpart H of part 266 of this chapter rather than this part when burned for energy recovery unless the presumption of mixing can be successfully rebutted. According to the company, the used oil procured by the facility does not contain total halogens greater than 1,000 ppm; consequently, as agreed with the company on April 21, 2004, the permit limits the total halogens to 1,000 ppm.

Permit Condition 13 states that, in accordance with 40 CFR 279.11, used oil burned for energy recovery shall not exceed any of the allowable levels of the constituents and property listed in the following table.
TABLE 2  USED OIL SPECIFICATIONS\(^1\)

<table>
<thead>
<tr>
<th>Constituent/property</th>
<th>Allowable level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>5 ppm(^2) maximum</td>
</tr>
<tr>
<td>Cadmium</td>
<td>2 ppm maximum</td>
</tr>
<tr>
<td>Chromium</td>
<td>10 ppm maximum</td>
</tr>
<tr>
<td>Lead</td>
<td>100 ppm maximum</td>
</tr>
<tr>
<td>Flash point</td>
<td>100 deg. F minimum</td>
</tr>
<tr>
<td>Total halogens</td>
<td>1,000 ppm maximum</td>
</tr>
</tbody>
</table>

1  The specification does not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see 40 CFR 279.10(b)).

2  Parts per million

This table is based on Table 1 from 40 CFR 279.11, incorporating the 1,000 ppm limit for total halogens as explained above.

**NESHAP Applicability (40 CFR 61)**

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

**MACT Applicability (40 CFR 63)**

Since the previous permit was issued, EPA has issued new MACT standards under 40 CFR Part 63, Subpart ZZZZ for internal combustion compression ignition engines. The existing generator engines were not determined to be subject to Subpart ZZZZ, and a detailed applicability analysis follows.

**40 CFR 63, Subpart ZZZZ.................................National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines**

40 CFR 63.6585..............................\(\text{Am I subject to this Subpart?}\)

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR Part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) If you are an owner or operator of a stationary RICE used for national security purposes, you may be eligible to request an exemption from the requirements of this subpart as described in 40 CFR Part 1068, subpart C.
The facility was not classified as a major source of HAP emissions; refer to the Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) section for additional information concerning facility classification. In accordance with §63.6585(a) and (c), because the engines are existing RICE at an area source of HAP emissions, the requirements of this subpart would be applicable to the permittee if the generator engine(s) were operated as stationary sources. However, these generator engines will be operated only under portable operating scenarios and as nonroad engines. When operated as a nonroad engine, the requirements of Subpart ZZZZZ are not applicable.

With regard to the difference in definitions between “stationary internal combustion engine (ICE)” at 40 CFR 60.4219 and 40 CFR 63.6675, and the definition of “nonroad engine” at 40 CFR 1068.30;

- a nonroad engine means that 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 internal combustion engine is not a nonroad 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.

In order to ensure that engines are operated as nonroad engines, the requirement to use nonroad engine(s) and to monitor the time the engine(s) are operated at each location associated with the hot mix asphalt facility were included as permit conditions (Permit Conditions 23 and 25).

Nonroad engines are a category of units/equipment that are excluded from the definition of “stationary source” under the Clean Air Act Section 302(z), and hence are exempt from federal stationary source permitting requirements.\(^1\) For this reason and it was considered reasonable not to include such requirements in the permit. Although such requirements were not explicitly included in the permit, by not electing to regulate the generator engines as stationary sources they may be subject to and required to comply with nonroad engine requirements, including meeting the requirements of 40 CFR 89, 94, and/or 1068 as applicable.

**Permit Conditions Review**

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

Revised Permit Conditions 16 and 24

As described in the permit application cover letter, a daily asphalt production rate limit was added to Permit Condition 16 so that production rates after installation of the replacement dryer are the same as before. Therefore, there is not an increase in short term allowable emissions. To demonstrate compliance with the operating limit (and the associated limit on emissions resulting from this operating limit), a requirement to monitor and record the short term production rate was added to Permit Condition 24.

Revised Permit Condition 21

This permit condition has been revised to require an initial performance test after installation of the “replacement dryer”. The dryer is a substantial component of the HMA plant that can affect overall emissions, therefore, it is reasonable to require a new test upon installation of this unit after which testing will resume according to the normal schedule.

Existing/Obsolete Permit Condition 2.19

This existing permit condition referred to the TAPs Review for HMA Plants, “currently” under development by DEQ in 2004. That action has been completed and this permit condition is now obsolete, therefore, this permit condition was removed from the permit.

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New Permit Conditions 23 and 25

Since the previous permit was issued, EPA has issued new regulations that apply to internal combustion engines. To address the applicability of these requirements, two new permit conditions were added to the permit with that address the classification of the engines used as being “nonroad engines”. This is consistent with the approach typically used at this time for engines used at portable sources such as a hot-mix asphalt plant. If the facility later chooses to no longer use the engines as “nonroad engines, then the applicable requirements under 40 CFR 60 Subpart III and/or 40 CFR 60 Subpart ZZZZ must be complied with at that time.

Revised Permit Conditions 24, 26, 27 and 28

The interval for retaining records was changed from two years to five years to be consistent with the General Provisions currently included in all PTCs. It is recognized that a transition period will be necessary and it is unreasonable for the facility to be expected to have 5 years’ worth or records on hand immediately after this change takes effect. The facility will not be expected to have 5 years’ worth of records until 5 years after this permit is issued. During the interim period, the facility must maintain all necessary records and not discard any until the five year point is reached. After that time, only records for the past 5 years must be maintained per the General Provisions of this permit.

Permit Condition 29

This permit condition regarding “relocation” requirements was not substantively changed. The most current DEQ webpage was added to make it easier to find the portable source relocation form.

Permit Conditions 31-46: Permit to Construct General Provisions

The current version of the Permit to Construct General Provisions is included in this revised permit. Note that existing Permit Conditions 2.24 (performance test protocol), 2.25 (performance test report) and 2.26 (certification of documents) were moved from the main body of the permit and placed into the General Provisions section of the permit.

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.
The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

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

PTC Fee Calculation

Company: CPM Development Corp
Address: Portable Hot-Mix Asphalt Plant #25
City: 
State: 
Zip Code: 
Facility Contact: Jana McDonald
Title: Environmental Engineer
AIRS No.: 777-00225

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

Y Did this permit require engineering analysis? Y/N

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

<table>
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<tr>
<th>Pollutant</th>
<th>Annual Emissions Increase (T/yr)</th>
<th>Annual Emissions Reduction (T/yr)</th>
<th>Annual Emissions Change (T/yr)</th>
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<tr>
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Fee Due: $1,000.00

Comments: