



# **Air Quality Permitting Statement of Basis**

March 26, 2004

**Permit to Construct No. P-040505**

**H-K Contractors, Inc., Portable**

**Facility ID No. 777-00004**

*Prepared by:*

*Dustin Holloway, Permitting Analyst  
AIR QUALITY DIVISION*

**FINAL REVISED PERMIT**

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## ACRONYMS, UNITS, and CHEMICAL NOMENCLATURES

CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
T/yr	tons per year

## **1. PURPOSE**

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

## **2. PROJECT DESCRIPTION**

This project is a revision to PTC No. P-030508, issued January 13, 2004. The permit is revised to require an O&M manual to document the wet scrubber operating parameters, such as scrubbing media flow rate and pressure drop. This project is a PTC revision and is being processed in accordance with IDAPA 58.01.01.204.

## **3. SUMMARY OF EVENTS**

On January 13, 2004, DEQ issued PTC No. P-030508 to H-K to replace an electrical generator set at the portable facility. After permit issuance DEQ met with representatives from H-K for a permit handoff meeting. During the meeting H-K objected to the minimum pressure drop and scrubbing media flow rate provisions that were added to the permit after the public comment period. These provisions are too restricting and not necessary to show compliance. On March 3, 2004, DEQ received a written request from H-K to amend their permit to replace the minimum scrubbing media flow rate and minimum pressure drop requirements in Permit Conditions 2.9 and 2.10 with an O&M manual requirement.

## **4. PERMIT ANALYSIS**

### **4.1 *Equipment Listing***

There are no equipment changes associated with this permit revision.

### **4.2 *Emissions Inventory***

There are no changes to the emissions at this facility as a result of this permit revision.

### **4.3 *Modeling***

Modeling was not required for this permit revision.

### **4.4 *Regulatory Review***

#### **Monitoring Requirements**

DEQ reviewed H-K's request and determined that changing the pressure drop and scrubbing media flow rates to manufacturer specifications is sufficient to demonstrate compliance with the permit's emissions limits. In addition, O&M manual requirements are consistent with other permits issued for hot-mix asphalt plants in Idaho. The permittee is now required to develop an operations and maintenance (O&M) manual that contains the manufacturer specifications for the wet scrubber pressure drop and scrubbing media flow rate. Permit Conditions 2.9 and 2.10 now require that the wet scrubber pressure drop and scrubbing media flow rate be maintained within manufacturer and O&M manual specifications. Permit Condition 2.8 requires the permittee to develop an O&M manual within 60 days after permit issuance and submit it to DEQ within 30 days after development.

## **5. RECOMMENDATION**

Staff recommend that H-K be issued PTC No. P-040505 which revises PTC No. P-030508 issued January 13, 2004. An opportunity for public comment on the air quality aspects of the proposed permit is not required in accordance with IDAPA 58.01.01.209.04.

MS/DH/sd      Permit No. P-040505

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