



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

November 9, 2004

Certified Mail No. 7000 0520 0016 0850 3151

Mr. Terrance Hamblin
Safety Director
Gordon Paving Company
837 Madrona Street South
Twin Falls, ID 83301

RE: Facility ID No. 083-00005, Gordon Paving Company, Twin Falls Facility
Final Permit Letter

Dear Mr. Hamblin:

The Idaho Department of Environmental Quality (DEQ) is issuing revised Permit to Construct (PTC) No. P-030411 to Gordon Paving Company for its hot-mix asphalt facility located in Twin Falls in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your permit application received September 3, 2004. This PTC replaces PTC No. 083-00005, issued May 4, 1999, the terms and conditions of which no longer apply.

This permit does not release Gordon Paving Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative from the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd

Permit No. P-040411

Enclosures



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-040411

FACILITY ID No: 083-00005

AQCR: 063

CLASS: SM

SIC: 2951

ZONE: 11

UTM COORDINATE (km): 715.5, 4713.2

1. PERMITTEE

Gordon Paving Company – Twin Falls Facility

2. PROJECT

Hot-Mix Asphalt Plant

3. MAILING ADDRESS

837 Madrona Street South

CITY

Twin Falls

STATE

ID

ZIP

83301

4. FACILITY CONTACT

Terrance Hamblin

TITLE

Safety/Environmental Compliance Director

TELEPHONE

(208) 733-1800

5. RESPONSIBLE OFFICIAL

Brandon Hansen

TITLE

Vice President

TELEPHONE

(208) 733-1800

6. EXACT PLANT LOCATION

837 Madrona Street South, Twin Falls, Idaho

COUNTY

Twin Falls

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Hot-mix asphalt production (including aggregate, asphalt, and concrete production when collocated)

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: November 9, 2004

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE	4
2. STATEWIDE REQUIREMENTS.....	5
3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED.....	9
4. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED.....	10
5. PM ₁₀ NONATTAINMENT AREA REQUIREMENTS.....	11
6. APPENDIX.....	12
7. PERMIT TO CONSTRUCT GENERAL PROVISIONS	13

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
O&M	operations and maintenance
PERF	Portable Equipment Registration and Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/day	tons per day
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- This PTC establishes enforceable permit conditions that limit the facility's potential to emit to protect ambient air quality standards.
- This PTC replaces PTC No. 083-00005, issued May 4, 1999, the terms and conditions of which shall no longer apply.

P-990038

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

2. STATEWIDE REQUIREMENTS

The permittee shall comply with the following source-wide conditions when the hot-mix asphalt facility is operated anywhere within the state of Idaho.

Emissions Limits

2.1 Asphalt Dryer Emission Limits

Particulate matter (PM) emissions from the hot-mix asphalt dryer stack shall not exceed 0.04 gr/dscf, nor shall PM₁₀ emissions from the hot-mix asphalt dryer stack exceed any corresponding emission rate limit listed in the appendix of this permit.

2.2 Other Particulate Matter Emission Limits

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from a stack, vent, or other functionally equivalent opening shall not contain PM emissions in excess of 0.04 gr/dscf.

2.3 Opacity Limit

Emissions emanating from any stack, vent, or other functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625, *Rules for the Control of Air Pollution in Idaho*. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

2.4 Visible Emission Limit at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

Operating Requirements

2.5 Dryer Burner Fuel

The fuels allowed to be combusted in the dryer burner shall be fuel oil, used oil, natural gas, or propane gas.

2.6 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.7 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment and the scrubbing-media flow rate to the air pollution control equipment. A scrubbing-media flow rate monitor is required only if a wet scrubber is used to control some or all of the emissions from the hot-mix asphalt plant.

2.8 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the air pollution control device which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

2.9 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure-drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.10 Scrubbing-media Flow rate

When a wet scrubber is utilized, the scrubbing-media flow rate to the air pollution control device shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating scrubbing-media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

Monitoring and Recordkeeping Requirements

2.11 Monitor Facility Throughput

The permittee shall monitor and record the hot-mix asphalt production in tons-per-day (T/day). Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.12 Air Pollution Control Equipment

The following operating parameters shall be monitored and recorded once daily while the air pollution control equipment is operating. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control equipment
- Scrubbing media flowrate to the air pollution control equipment when a wet scrubber is utilized

2.13 Reasonable Control Measures

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The records shall include the type of control used (i.e. water, environmentally safe chemical dust suppressants, etc.) as well as the circumstances under which no controls are used. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.14 Performance Test Documentation

The permittee shall maintain a copy of the performance test results and all test data for the most recently conducted performance test on this hot-mix asphalt plant. The performance test report shall be made available to DEQ representatives upon request.

2.15 Relocation

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit to DEQ a complete Portable Equipment Registration and Relocation Form (available on the DEQ website at: www.state.id.us/deq/air/equipreocat.htm) in accordance with IDAPA 58.01.01.500 to the following address:

PERF Processing Unit
Idaho Department of Environmental Quality
601 Pole Line Road, Suite 2
Twin Falls, ID 83301

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

2.16 Certification of Documents

All documents, including, but not limited to, application forms for Permits to Construct, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED

The permittee shall comply with the requirements in Permit Condition 2 and the following permit conditions when the hot-mix asphalt facility is operated in any attainment or unclassifiable areas, and when it is not collocated within the state of Idaho.

Operating Requirements

3.1 Facility Throughput Limits

The production rate of the hot-mix asphalt facility shall not exceed a maximum of 2,628,000 tons per any consecutive 12-month period (T/yr) when located in any attainment or unclassifiable area.

3.2 Collocation Requirements

When the hot-mix asphalt facility is to be collocated with another portable rock-crushing plant, portable concrete batch plant, or portable hot-mix asphalt plant, the permittee must comply with the collocation requirements in Permit Condition 4.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

4. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED

The permittee shall comply with the conditions in Permit Condition 2 and the following permit conditions when the hot-mix asphalt facility is to be collocated with another portable hot-mix asphalt plant, rock-crushing plant, or concrete batch plant within the state of Idaho. The hot-mix asphalt facility may collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable hot-mix asphalt plant, which has been permitted to specifically allow for collocation.

Operating Requirements

4.1 Collocation Areas

The hot-mix asphalt facility may collocate in attainment or unclassifiable areas only. The permittee shall not collocate in a nonattainment area or proposed nonattainment area without obtaining a permit which specifically allows for collocation in a nonattainment area.

4.2 Number of Portable Sources

The hot-mix asphalt facility may collocate with either one portable rock-crushing plant, one portable concrete batch plant, or one other portable hot-mix asphalt plant, which has been permitted to specifically allow for collocation.

4.3 Facility Throughput Limits

The production rate of the hot-mix asphalt facility shall not exceed 1,314,000 tons per any consecutive 12-month period (T/yr) when collocated with another portable rock-crushing plant, portable concrete batch plant, or portable hot-mix asphalt plant.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

5. PM₁₀ NONATTAINMENT AREA REQUIREMENTS

The permittee shall comply with the conditions in Permit Condition 2 and the following permit conditions when the hot-mix asphalt facility is operated in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area within the state of Idaho. While operating the hot-mix asphalt facility under the requirements set forth in Permit Condition 5, the hot-mix asphalt facility may not collocate with any other facility.

Operating Requirements

5.1 Facility Throughput Limits

The hot-mix asphalt facility shall not exceed the following production rates when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

- The production rate of the hot-mix asphalt facility shall not exceed 2,362 tons per day (T/day)
- The production rate of the hot-mix asphalt facility shall not exceed 862,310 tons per any consecutive 12-month period (T/yr)

5.2 Collocation Requirements

The hot-mix asphalt facility shall not be collocated with another portable rock-crushing plant, portable concrete batch plant, or portable hot-mix asphalt plant when located in any PM₁₀ nonattainment area or proposed PM₁₀ nonattainment area.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

6. APPENDIX

Portable Hot-Mix Asphalt Facility

Gordon Paving Company, Twin Falls Facility

Table 6.1 HOURLY PM₁₀ EMISSIONS LIMITS*

Source Description	PM₁₀ (lb/hr)
Dryer stack outlet	3.6

* As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by the DEQ's emission estimation methods used in the permit application analysis.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

7. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter at reasonable times upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emissions testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If emission testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157, and shall not be conducted on weekends or state holidays without prior written approval from the DEQ. Testing procedures and specific time limitations may be modified by the DEQ by prior negotiation if conditions warrant adjustment. The DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test made available to the DEQ upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040411

Permittee:	Gordon Paving Company	Facility ID No. 083-00005	Date Issued:	November 9, 2004
Location:	Twin Falls, Idaho			

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the DEQ, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.

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