

DEPARTMENT OF
HEALTH AND ENVIRONMENTAL SCIENCES
AIR QUALITY BUREAU



STAN STEPHENS, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

(406) 444-3454
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HELENA, MONTANA 59620

August 24, 1992

Ron Thornberry
P.O. Box 1415
Whitefish, MT 59937

Dear Mr. Thornberry:

The Department of Health and Environmental Sciences has made its determination on the air quality permit application for your 1965 Cedar Rapids Model H230, Serial #26401, H&B Baghouse SB8-4050. The application was given permit number 2746-00. This permit shall become final on September 8, 1992 unless the department's determination is appealed to the Board of Health and Environmental Sciences.

Conditions: See attached.

For the department,

Jeffrey T. Chaffee, P.E.
Chief, Air Quality Bureau

JTC:tjl

Enclosure

*Is this a non-NSPS source?
If this is an NSPS source then
the 0.1 g/dscf is incorrect. 0.04 g/dscf
is the NSPS requirement.*

cc: Bill Hileman, T. Bend attorney

RTE.	ACT.	ACC.
EPA	cc	8/24
EQC	cc	8/24
JR		8/24
JPS		8/31
CG		8/26
AK		9/3/92
JR	FILE	9/14
TECH	ADM	ENF

*P-T Bend Construction
2746-00*

PERMIT CONDITIONS

T-Bend Construction
Permit Number 2746-00

1. If this asphalt plant is moved to another location, a Notice of Intent to Transfer Location of Air Quality Permit must be published in a newspaper of general circulation in the area to which the transfer is to be made. This notice must be published at least fifteen (15) days prior to the move. Proof of publication and a change of location form must be submitted to the Montana Department of Health and Environmental Sciences Air Quality Bureau (AQB), prior to the move. These forms are available from the AQB.
2. The AQB may modify the conditions of this permit based on local conditions of any future site. These factors may include but are not limited to local terrain, meteorological conditions, proximity to residences, etc.
3. All visible emissions are limited to 20% opacity.
4. Dust suppressant is required on all haul roads and work areas as necessary (if fugitive emissions are greater than 20% opacity).
5. All visible emissions from material transfer and storage areas are limited to 20% opacity.
6. Asphalt plant emissions are limited to 0.10 gr/dscf, "back-half" emissions included.
7. An EPA methods 1-5 source test must be performed on the asphalt plant every four years to demonstrate compliance with condition #6. This test shall consist of three runs, each of at least 60 minutes duration. The test shall be conducted in compliance with the requirements of 40 CFR Part 60, Subpart A, General Provisions; EPA Reference Methods 1-5, 40 CFR Part 60, Appendix A; and 40 CFR Part 60, Subpart I, Asphaltic Concrete Plants.
8. An EPA Method 9 opacity test must also be performed in conjunction with the particulate tests to demonstrate compliance with condition #3. This test shall consist of thirty 6-minute average observations with ten of these observations being conducted during each particulate test run.
9. The initial source tests as outlined in conditions #7 and #8 must be performed by July 1, 1993.
10. These tests must be conducted in compliance with the pre-test notification and reporting requirements of the AQB's Compliance Source Test Protocol.
11. Production field data sheets must be supplied as part of the test report. Since asphalt production will be limited to the average production rate during the test, it is suggested the test be performed at the highest production rate practical.

12. The AQB must be notified of the test five working days before the test is scheduled to be performed. The AQB must also be notified the day before the test is performed to confirm the test. The responsibility for notification is that of the owner/operator.
13. The original asphalt production rate is limited to 100 tons/hour.
14. Once a stack test is performed, the asphalt production rate is limited to the average production rate during the last source test.
15. The asphalt plant operation is limited to 8760 hours/year.
16. Failure to demonstrate compliance with the applicable emission limitations shall be deemed operation without a permit.
17. The operator must maintain on-site records showing daily production rates for the current calendar year. These records shall be available for inspection by the AQB and will be submitted to the AQB upon request.
18. Annual production information shall be submitted to the AQB by March 1 of the following calendar year. The information shall include:
 - a. Tons of asphalt produced.
 - b. Hours of operation.
 - c. Type and amount of fuel used for the plant.
 - d. Fugitive dust information consisting of a listing of all plant vehicles including the following for each vehicle type:
 - 1) number of vehicles;
 - 2) vehicle type;
 - 3) vehicle weight, loaded
 - 4) vehicle weight, unloaded;
 - 5) number of tires on vehicle;
 - 6) average trip length;
 - 7) number of trips per day;
 - 8) average vehicle speed;
 - 9) area of activity; and
 - 10) vehicle fuel usage (gasoline or diesel) annual total.
19. A device to measure the pressure drop (magnehelic gauge, manometer, etc.) on the control device (wet scrubber, baghouse, etc.) shall be installed and maintained. Pressure drop shall be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained.
20. Pressure drop on the control device and temperatures will be recorded during the test and reported as part of the test results.
21. Recipient shall comply with all general conditions noted on attached page.

General Conditions

- A. Inspection - The recipient shall allow the department's representatives access to the source at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Specific listing of requirements, limitations, and conditions contained herein does not relieve the applicant from compliance with all applicable statutes and administrative regulations including amendments thereto, nor waive the right of the department to require compliance with all applicable statutes and administrative regulations, including amendments thereto.
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 et seq., MCA.
- E. Appeals - Any person or persons who are jointly or severally adversely affected by the department's decision may request, within fifteen (15) days after the department renders its decision, upon affidavit, setting forth the grounds therefor, a hearing before the Board. A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The department's decision on the application is not final unless fifteen (15) days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the department's decision until the conclusion of the hearing and issuance of a final decision by the Board.
- F. Application Data - Information submitted on behalf of an air quality permit application is hereby incorporated as a condition of that permit including commencement and completion dates of construction.
- G. Permit Inspection - As required by ARM 16.8.1115 Inspection of Permit, a copy of the air quality permit shall be made available for inspection by air quality personnel at the location of the permitted source.
- H. Construction Commencement - Construction must begin within three years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- I. Permit Fees - Pursuant to Section 75-2-211, MCA, as amended by the 1991 Legislature, the continuing validity of this permit is conditional upon the payment by the permittee of an annual operation fee, as required by that Section and rules adopted thereunder by the Board of Health and Environmental Sciences.

PERMIT ANALYSIS

T-Bend Construction
Permit Number 2746-00

- A. Permitted Equipment: 1965 Cedar Rapids Model H230, Serial #26401, H&B Baghouse SB8-4050
- B. Discussion: The application for Air Quality Permit #2746-00 is for a 1965 Cedar Rapids Asphalt plant with an H&B SB8-4050 baghouse. In May, 1990, PACE Incorporated performed a particulate emission compliance test on the above facility which showed that the facility was in compliance. In 1991, a fire destroyed the baghouse and it has since been rebuilt by Albarrie Environmental Services. In order to determine compliance with asphalt plant permit conditions for the rebuilt baghouse, the Air Quality Bureau has required that a source test must be completed by July 1, 1993. The test will consist of EPA Methods 1-5 and Method 9 and must be performed every 4 years thereafter.

C. Estimated Emissions:

TSP Emissions (Per AP-42, 8.1-1)

Controls Baghouse H&B SB8-4050 #25-0032

$$.02 \text{ lbs/ton} \times 100 \text{ tons/hr} = 2.0 \text{ lbs/hr}$$

$$2.0 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 8.76 \text{ tons/yr}$$

PM-10 (assume 50% of TSP)

Controls Baghouse

$$0.01 \text{ lbs/ton} \times 100 \text{ tons/hr} = 1.0 \text{ lbs/hr}$$

$$1.0 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 4.38 \text{ tons/yr}$$

SOx (AFSSC 3-05-002-01, Page 116)

Controls None

$$.073 \text{ lbs/ton} \times 100 \text{ tons/hr} = 7.3 \text{ lbs/hr}$$

$$7.3 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 31.97 \text{ tons/yr}$$

NOx (AFSSC 3-05-002-01, Page 116)

Controls None

$$.036 \text{ lbs/ton} \times 100 \text{ tons/hr} = 3.6 \text{ lbs/hr}$$

$$3.6 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 15.77 \text{ tons/yr}$$

VOC (AFSSC 3-05-002-01, Page 116)

Controls None

$$\begin{aligned} &.028 \text{ lbs/ton} \times 100 \text{ tons/hr} = 2.8 \text{ lbs/hr} \\ &2.8 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 12.26 \text{ tons/yr} \end{aligned}$$

CO (AFSSC 3-05-002-01, Page 116)

Controls None

$$\begin{aligned} &.038 \text{ lbs/ton} \times 100 \text{ tons/hr} = 3.8 \text{ lbs/hr} \\ &3.8 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \frac{1}{2000} \text{ tons/lbs} = 16.64 \text{ tons/yr} \end{aligned}$$

D. Applicable Rules:

16.8 Subchapter 8 Ambient Air Quality

16.8.821 Ambient Air Quality Standard for PM-10

The plant is located outside of the Kalispell non-attainment area and is not part of the State Implementation Plan. It is a portable source which will have minimal impacts on the surrounding area.

16.8 Subchapter 9 Prevention of Significant Deterioration (PSD)

Potential emissions are <250 tons/yr, asphalt plants are not a listed source: PSD does not apply.

16.8 Subchapter 11 Permit, Construction and Operation of Air Contaminant Sources

16.8.1102 When Permit Required

Permits are required for asphaltic concrete plants that have the potential to emit greater than 5 tons/year of any pollutant. A permit is therefore required.

16.8.1103 Emission Controls

Best Available Control Technology (BACT) is required. The Air Quality Bureau has determined that the conditions imposed on this plant constitute BACT in this case.

The Air Quality Bureau has determined that BACT for pre-NSPS asphalt plants is an emission limitation of 0.10 gr/dscf. A source test will be required every four years to demonstrate compliance.

16.8.1105 New or Altered Sources and Stacks, Permit Application Requirements

Proof of compliance with the public notice requirement was submitted.

16.8.1115 Inspection of Permit

A copy of this permit must be maintained on-site and be made available for inspection by AQB personnel on request.

16.8.1117 Compliance with Other Statutes and Rules

The holder of this permit must comply with all other applicable state, federal and local laws and regulations.

16.8.1118 Waivers

ARM 16.8.1105 requires that the permit application be submitted 180 days before construction or operation begins. This section allows the AQB to waive this time limit. The AQB hereby waives the time limit in this case.

16.8 Subchapter 14 Emission Standards

16.8.1401 Particulate Matter - Airborne

An opacity limitation of 20% is required for fugitive sources. Dust suppressant is therefore required as necessary on all haul roads and work areas.

16.8.1403 Particulate Matter Industrial Process

Allowable Emissions = $55 (100 \text{ tons/hr})^{.11} - 40 = 51.28 \text{ lbs/hr.}$

Source is in compliance.

16.8.1404 Visible Air Contaminants

All visible stack emissions limited to 20% opacity.

16.8.1423 Standards of Performance for New Stationary Sources (NSPS)

This plant was constructed in 1965 so NSPS (40 CFR Part 60, general provisions and Subpart I Hot Mix Asphalt Facilities) does not apply.

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
Air Quality Bureau
Cogswell Building, Helena, Montana 59620
(406) 444-3454

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Project or Application: T Bend Construction Permit #2746-00

Description of Project: The permit is for the operation of a 1965 Cedar Rapids Portable Asphalt Plant, Model #H230, Serial #26401.

Benefits and Purpose of Proposal: The plant produces asphalt for use in construction, repair, and maintenance of roads and highways.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider: No reasonable alternatives available.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency: A list of enforceable conditions are contained in permit #2746-00

Recommendation: An EIS is not required.

If an EIS is needed, and if appropriate, explain the reasons for preparing the EA:

If an EIS is not required, explain why the EA is an appropriate level of analysis: The plant's impacts will be minimal.

Other groups or agencies contacted or which may have overlapping jurisdiction: None

Individuals or groups contributing to this EA: Department of Health and Environmental Sciences, Air Quality Bureau

EA prepared by: John Ruth

Date: August 24, 1992

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN ATTACHED COMMENTS

1. TERRESTRIAL AND AQUATIC LIFE AND HABITATS
2. WATER QUALITY, QUANTITY AND DISTRIBUTION
3. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE
4. VEGETATION COVER, QUANTITY AND QUALITY
5. AESTHETICS
6. AIR QUALITY
7. UNIQUE ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCE
8. DEMANDS ON ENVIRONMENTAL RESOURCE OF WATER, AIR AND ENERGY
9. HISTORICAL AND ARCHAEOLOGICAL SITES
10. CUMULATIVE AND SECONDARY IMPACTS

	MAJOR	MODERATE	MINOR	NONE	UNKNOWN	ATTACHED	COMMENTS
1.			x				
2.			x				
3.			x				
4.			x				
5.			x				
6.			x				
7.					x		
8.			x				
9.					x		
10.			x				

POTENTIAL IMPACTS ON HUMAN ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN ATTACHED COMMENTS

1. SOCIAL STRUCTURES AND MORES
2. CULTURAL UNIQUENESS AND DIVERSITY
3. LOCAL AND STATE TAX BASE AND TAX REVENUE
4. AGRICULTURAL OR INDUSTRIAL PRODUCTION
5. HUMAN HEALTH
6. ACCESS TO AND QUALITY OR RECREATIONAL & WILDERNESS ACTIVITIES
7. QUANTITY AND DISTRIBUTION OF EMPLOYMENT
8. DISTRIBUTION OF POPULATION
9. DEMANDS FOR GOVERNMENTAL SERVICES
10. INDUSTRIAL AND COMMERCIAL ACTIVITY
11. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS
12. CUMULATIVE AND SECONDARY IMPACTS

	MAJOR	MODERATE	MINOR	NONE	UNKNOWN	ATTACHED	COMMENTS
1.				x			
2.				x			
3.			x				
4.			x				
5.			x				
6.			x				
7.			x				
8.			x				
9.			x				
10.			x				
11.			x				
12.			x				