



Montana Department of
ENVIRONMENTAL **Q**UALITY

Brian Schweitzer, Governor

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June 19, 2012

Paul Thompson
Jim Gilman Excavating, Inc.
3099 Grand Ave
Butte, MT 59701

Dear Mr. Thompson:

Montana Air Quality Permit #2542-05 is deemed final as of June 19, 2012, by the Department of Environmental Quality (Department). This permit is for a portable drum mix-asphalt and associated equipment. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Doug Kuenzli
Environmental Science Specialist
Air Resources Management Bureau
(406) 444-4267

VW:DCK
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #2542-05

Jim Gilman Excavating, Inc.
3099 Grand Ave
Butte, MT 59701

June 19, 2012



MONTANA AIR QUALITY PERMIT

Issued to: Jim Gilman Excavating, Inc.
3099 Grand Ave
Butte, MT 59701

MAQP: #2542-05
Administrative Amendment (AA) Request
Received: 05/09/2012
Department's Decision on AA: 06/01/2012
Permit Final: 06/19/2012
AFS: #777-2542

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Jim Gilman Excavating, Inc. (Gilman) pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

Gilman owns and operates a portable drum mix-asphalt plant with a home pit located in Section 25, Township 4 North, Range 10 West in Deer Lodge County, Montana. However, MAQP #2542-05 applies while operating at any location in Montana, except those areas having a Department of Environmental Quality (Department) approved permitting program or areas considered tribal lands. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* Addendum #1 will apply to the Gilman facility while operating at locations in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of ten microns or less (PM₁₀) nonattainment areas during the summer season (April 1 – September 30). A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Current Permit Action

On May 9, 2012, the Department received correspondence from Gilman requesting authorization to operate the portable asphalt plant within the Butte PM₁₀ Nonattainment Area. The current permit action incorporates Addendum #1 into the air quality permit to apply limitations and conditions while operating in or within 10 km of any PM₁₀ nonattainment area. In addition the permit was updated to reflect current language used by the Department.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. Asphalt plant particulate matter emissions shall be limited to 0.04 grains per dry standard cubic feet (gr/dscf) (ARM 17.8.752; ARM 17.8.340 and 40 Code of Federal Regulations (CFR) 60, Subpart I).
2. Gilman shall not cause or authorize to be discharged into the atmosphere from the asphalt plant stack emissions that exhibit 20% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.304; ARM 17.8.340 and 40 CFR 60, Subpart I).
3. Gilman shall not cause or authorize to be discharged into the atmosphere from 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, any visible emissions that exhibit opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308).

4. Gilman shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
5. Gilman shall treat all unpaved portions of the haul roads, access roads, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.4 (ARM 17.8.749).
6. Gilman shall install, operate, and maintain a baghouse for control of particulate matter. A device to measure the pressure drop (magnehelic gauge, manometer, etc.) on the control device (baghouse) must be installed and maintained. Pressure drop must be measured in inches of water. Temperature indicators at the control device inlet and outlet must be installed and maintained (ARM 17.8.749).
7. Gilman shall be limited to a maximum of 550,000 tons of asphalt production during any rolling 12-month period (ARM 17.8.749 and ARM 17.8.1204).
8. The asphalt production rate shall be limited to the average production rate during the last source test demonstrating compliance (ARM 17.8.749).
9. The maximum capacity of the diesel-fired engine used to drive the generator to supply power for the test trailers shall not exceed 150 horsepower (hp). The engine/generator shall not operate more than 5,800 hours during any rolling 12 month period (ARM 17.8.749 and ARM 17.8.1204).
10. The maximum capacity of the diesel-fired engine used to drive the generator to supply power during downtime (periods in which power is desired but asphalt production is not occurring or commencing to occur) shall not exceed 150 hp. The engine/generator shall not operate more than 5,800 hours during any rolling 12 month period (ARM 17.8.749 and ARM 17.8.1204).
11. The total maximum capacity of the diesel-fired engine(s) used to drive the generator(s) to supply power during production (periods in which asphalt production is occurring or commencing to occur) shall not exceed 1,760 hp. The engine(s)/generator(s) shall not operate more than a combined 2,000 hours during any rolling 12 month period (ARM 17.8.749 and ARM 17.8.1204).
12. Gilman shall limit the number of diesel-fired generator sets on-site at any one time to four engines/generators or less including those engines described in Sections II.A.9, II.A.10, and II.A.11 (ARM 17.8.749).
13. Gilman shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities* (ARM 17.8.340 and 40 CFR 60, Subpart I).
14. Gilman shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart III; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

15. If the permitted equipment is used in conjunction with any other equipment owned or operated by Gilman, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons of emissions during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).

B. Testing Requirements

1. An EPA Methods 1-5, and 9 source test must be performed on the asphalt plant every four years after the initial source test to demonstrate compliance with the conditions specified in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.105 and ARM 17.8.749).
2. Pressure drop on the control device and temperature at the control device inlet and outlet must be recorded during the test and reported as part of the test results (ARM 17.8.749).
3. Pressure drop on the control device and temperature at the control device inlet and outlet must be recorded daily and kept on site according to Section II.C.2 (ARM 17.8.749).
4. 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 (ARM 17.8.749).
5. Gilman may retest at any time in order to test at a higher production rate (ARM 17.8.749).
6. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
7. The Department may require further testing (ARM 17.8.105).

C. Reporting Requirements

1. If this plant is moved to another location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department. The facility shall not operate in the new location for more than one year (ARM 17.8.749 and ARM 17.8.765).
2. Gilman shall maintain on-site records showing daily hours of operation, daily production rates, and daily pressure drop and temperature readings for the last 12 months. The records compiled in accordance with this permit shall be maintained by Gilman as a permanent business record for at least 5 years following the date of the measurement, shall be submitted to the Department upon request, and shall be available at the plant for inspection by the Department (ARM 17.8.749).
3. Gilman shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but not be limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used for calculating operating fees, and/or to verify compliance with permit limitations (ARM 17.8.505).

4. Gilman shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include *the addition of a new emissions unit*, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
5. Gilman shall document, by month, total asphalt production from the asphalt plant. By the 25th day of each month, Gilman shall total the asphalt production for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.7. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Gilman shall document, by month, the hours of operation and the designed horsepower rating of each diesel generator engine. By the 25th day of each month, Gilman shall total the hours of operation for the diesel generator engines for the previous month. Gilman shall separate the hours of operation of the generator engines to clearly show the permit condition for which the hours apply. The monthly information will be used to verify compliance with the rolling 12-month limitations in Sections II.A.9, II.A.10, and II.A.11. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
7. Gilman shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

SECTION III: General Conditions

- A. Inspection – Gilman shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emissions Monitoring System (CEMS), Continuous Emissions Rate Monitoring System (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 Gilman fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Gilman of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, et seq. (ARM 17.8.756).

- 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 jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department’s decision on the application is final 16 days after the Department’s decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Gilman may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).
- I. The Department 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.
- J. Gilman shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program or areas considered tribal lands.

Montana Air Quality Permit (MAQP) Analysis
Jim Gilman Excavating, Inc.
MAQP #2542-05

I. Introduction/Process Description

Jim Gilman Excavating, Inc. (Gilman) owns and operates a portable rotary drum-mix asphalt plant with a maximum rated design capacity of 500 tons per hour (TPH) of asphalt production.

A. Permitted Equipment

The following list of permitted equipment is provided for reference, as Portions of MAQP #2542-05 are written de minimis friendly, whereby operational flexibility is provided so that alternate equipment may be utilized as long as maximum capacities are not exceeded. See Section II of the MAQP for specific equipment limitations and/or conditions. Equipment permitted under this action includes, but is not limited to the following:

- 1996 Gencor Ultradrums 400 rotary drum dryer-mix asphalt plant (maximum capacity 500 TPH of asphalt, limited to the maximum production rate during the most recent stack test).
- 2000 CEI-2000A Diesel-fired asphalt oil heater (2.74 Million British Thermal Units per hour (MMBtu/hr))
- Hydrated lime storage silo
- Asphalt storage silo
- 1996 Gencor 138 baghouse (80,000 cubic feet per minute (ft³)). Asphalt plant and hydrated lime storage silo are controlled by a portable baghouse
- 1995 Marathon-Magnamax 575RSL4827 - 1,410 brake-horsepower (bhp) diesel-fired generator set
- 2000 Olympian D100P1 – 150 bhp diesel-fired generator set
- 2006 Cummins 100DGDB - 150 bhp diesel-fired generator set
- Aggregate handling equipment
- Associated equipment

B. Source Description

For a typical operational set-up, aggregate materials are fed via conveyor to the drum mixer, where the aggregate is dried and heated. Subsequently, mineral filler and asphalt oil are introduced into the drum mixer. Mineral filler is delivered from a storage silo to the drum via an enclosed feed auger system. Particulate emissions from the mineral filler storage and feeder system are routed to a baghouse for control. The raw materials are introduced into the drum mixer and continuously mixed and heated by the drum mixer until desired properties are obtained.

After heating and mixing is complete, the asphalt product is transferred from the drum mixer to the asphalt product silo, where the asphalt remains until it is loaded into trucks for transport. The operation is powered through the use of on-site diesel-fired engine generators.

The home-pit designation of this plant is Section 25, Township 4 North, Range 10 West in Deer Lodge County, Montana.

C. Permit History

On April 10, 1989, Gilman was issued **MAQP #2542-00** to operate a 1979 Barber Green DM-65 (8'X30') Portable Drum-Mix Asphalt Plant #DM65X247 and associated equipment.

On November 11, 1996, Gilman was issued **MAQP #2542-01** which reflected the fact that Gilman replaced their previously permitted drum dryer with a 1996 GenCor Drum Dryer (maximum production rate 500 TPH) and replaced the existing control equipment with a 1996 GenCor baghouse. MAQP #2542-01 replaced MAQP #2542-00.

On April 30, 1998, Gilman requested to be allowed to operate the facility in or within 10 kilometers (km) of any particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment area through September 30, 1998. The Department of Environmental Quality (Department) issued the permit on June 1, 1998. **MAQP #2542-02** replaced MAQP #2542-01.

On March 9, 2007, the Department received a request from Gilman to administratively amend their permit to specifically identify the existing asphalt heater and various generators currently permitted as “associated equipment,” and to replace the current permit condition expressed in hours per year to an equivalent production limit. Gilman later requested to limit operations to maintain their synthetic minor status. **MAQP #2542-03** replaced MAQP #2542-02.

On June 11, 2010, with additional submittals on June 18, 2010, the Department received a application, along with additional information, to allow for up to four generator engines and to divide the hour limitations on those engines to provide for more operational flexibility due to the manner in which they operate. The permit action modified the permit accordingly to; revise hours of operation limits on the generator engines, updated the emissions inventory to reflect the change in generator engine operations allowed, update the emissions inventory to include particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}), remove the addendum permitting operations within nonattainment area, and update the permit to the current format used by the Department. **MAQP #2542-04** replaced MAQP #2542-03.

D. Current Permit Action

On May 9, 2012, the Department received a correspondence from Gilman requesting authorization to operate the portable asphalt plant within the Butte PM₁₀ Nonattainment Area. The current permit action incorporates Addendum #1 into the air quality permit to apply limitations and conditions while operating in or within 10 km of any PM₁₀ nonattainment area. In addition the permit was updated to reflect current language used by the Department. **MAQP #2542-05** replaces MAQP #2542-04.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, are included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Gilman shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide (SO₂)
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide (NO₂)
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide (CO)
5. ARM 17.8.211 Ambient Air Quality Standards for Ozone (O₃)
6. ARM 17.8.220 Ambient Air Quality Standards for Settled Particulate Matter (PM)
7. ARM 17.8.221 Ambient Air Quality Standard for Visibility
8. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

Gilman must maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
 2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions are taken to control emissions of airborne particulate matter. (2) Under this rule, Gilman shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
 3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
 4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
 5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
 6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
 7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 Code of Federal Regulations (CFR) Part 60, Standards of Performance for New Stationary Sources (NSPS). Based on the information submitted by Gilman the portable drum mix-asphalt plant and associated equipment are subject to NSPS (40 CFR 60), as follows:
 - a. 40 CFR 60, Subpart A – General Provisions. This subpart applies to all equipment or facilities subject to an NSPS subpart as listed below:
 - b. 40 CFR 60, Subpart I – Standards of Performance of Hot Mix Asphalt Facilities. This subpart applies to any hot mix asphalt facility. Therefore, this facility is subject to this subpart.
 - c. 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE). Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines, and owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005, are subject to this subpart.

Applicability to this subpart is dependent upon the nature and location of operation. The diesel-fired generator engine associated with this air quality permit is a CI ICE engine potentially constructed after July 11, 2005; however, the engines will not be considered an affected source unless operated as a stationary source.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. This rule incorporates, by reference, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories. Based on the information submitted by Gilman the diesel-fired engines associated with MAQP #2542-05 is applicable to NESHAP (40 CFR 63), as follows:
 - a. 40 CFR 63, Subpart A – General Provisions. This subpart applies to all equipment or facilities subject to a NESHAP subpart as listed below:
 - b. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary RICE at a major or area source of Hazardous Air Pollutant (HAP) emissions is subject to this rule except if the stationary RICE is being tested at a stationary RICE test cell/stand. An area source of HAP emissions is a source that is not a major source. As an area source, the diesel RICE operated by Gilman is potentially subject to this rule. Although diesel RICE engines are an affected source, per 40 CFR 63.5490(b)(3), they do not have any requirements unless they are new or reconstructed after June 12, 2006. As Gilman is considered an area source of HAP emissions and operates RICE equipment, the engine is potentially subject to this subpart depending on the location and nature of operation.

D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A permit fee is not required for the current permit action because the action is considered an administrative change.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an MAQP or permit modification to construct, modify, or use any asphalt plant, crusher or screen that has the potential to emit (PTE) greater than 15 tpy of any pollutant. Gilman has a PTE greater than 15 tpy of oxides of nitrogen (NO_x), PM, PM₁₀, CO, SO₂, and volatile organic compounds (VOC); therefore, an MAQP is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the MAQP program.
 4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the MAQP Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application. (1) This rule requires that a permit application be submitted prior to the installation, modification, or use of a source. A permit application was not required for the current permit action because the permit change is considered an administrative action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative action.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that MAQPs shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Gilman of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An MAQP shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An MAQP may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An MAQP may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an MAQP may be transferred from one location to another if the Department receives a complete notice of intent to transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an MAQP may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modification--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because it is not a listed source and the facility's PTE is less than 250 tons per year of any pollutant (excluding fugitive emissions).

G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tpy of any pollutant;

- b. PTE > 10 tpy of a single hazardous air pollutant (HAP), PTE > 25 tpy of combined HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tpy of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2542-05 for Gilman, the following conclusions were made:
- a. Gilman has requested that federally-enforceable permit operating limits be established to maintain the facility's PTE to less than 100 tpy.
 - b. The facility's PTE is less than 10 tpy for any single HAP and less than 25 tpy of combined HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is subject to a current NSPS (40 CFR 60, Subpart I and Subpart III (potentially)).
 - e. This facility is potentially subject to a current NESHAP Standard (40 CFR 63, Subpart ZZZZ).
 - f. This source is not a Title IV affected source
 - g. This source is not a solid waste combustion unit.
 - h. This source is not an EPA designated Title V source.

Gilman requested federally-enforceable permit limitations to remain a minor source of emissions with respect to Title V. Based on these limitations, the Department determined that this facility is not subject to the Title V Operating Permit Program. However, in the event that the EPA makes minor sources that are subject to NSPS obtain a Title V Operating Permit; this source will be subject to the Title V Operating Permit Program.

- i. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's PTE.
 - i. In applying for an exemption under this section the owner or operator of the facility shall certify to the Department that the source's PTE does not require the source to obtain an air quality operating permit.
 - ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.
3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal by ARM 17.8.1204(3) shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. BACT Determination

A BACT determination is required for each new or modified source. Gilman shall install on the new or modified source the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was not required for the current permit action because the current permit action is considered an administrative change.

IV. Emission Inventory

Emission Source	Emissions Tons/Year [PTE] ^{(a)(b)}						
	PM	PM ₁₀	PM _{2.5}	CO	NO _x	SO ₂	VOC
Rotary Drum Mix Asphalt Plant w/ Venturi Scrubber	9.08	6.33	6.13	35.75	15.13	3.03	12.10
Hwy 88 Asphalt Heater	0.18	0.09	0.02	0.44	1.75	24.00	0.02
Aggregate Handling & Storage Piles	2.74	1.29	0.20	--	--	--	--
Aggregate Screening & Conveying	1.29	0.43	0.28	--	--	--	--
Lime Silo transfer & Conveying	0.02	0.02	0.02	--	--	--	--
Asphalt Storage & Handling	0.16	0.16	0.16	0.32	--	--	3.35
Asphalt Load-Out	0.14	0.14	0.14	0.37	--	--	1.14
Primary Diesel Engine [≤ 1,760 bhp]	3.87	3.87	0.68	11.76	54.56	3.61	4.42
Secondary Diesel Engine [≤150 bhp]	0.96	0.96	0.17	2.91	13.49	0.89	1.09
Tertiary Diesel Engine [≤150 bhp]	0.96	0.96	0.17	2.91	13.49	0.89	1.09
Unpaved Roadways	5.49	1.51	0.15	--	--	--	--
TOTAL EMISSIONS ►	24.88	15.77	8.14	54.45	98.41	32.42	23.23

(a) Emission Inventory reflects enforceable limits on hours of operation of the diesel-fired generator engine and asphalt production throughput to maintain allowable CO and NO_x emissions below the Title V threshold [100 tpy].

(b) PM/PM₁₀/PM_{2.5} emissions presented in the table represent the sum of the filterable and condensable particulate matter (CPM) fractions.

ASOS, Automated Surface Observing System	
AWOS, Automated Weather Observing System	NO _x , oxides of nitrogen
bhp, brake-horsepower	PTE, Potential To Emit
CO, carbon monoxide	PM, particulate matter
Btu, million British Thermal Units	PM _{COND} , condensable particulate matter [< 2.5 microns]
dscf, dry standard cubic feet	PM ₁₀ , particulate matter with an aerodynamic diameter of 10 microns or less
g, grams	PM _{2.5} , particulate matter with an aerodynamic diameter of 2.5 microns or less
gr, grains	SM, synthetic minor (with respect to Title V criteria pollutants)
HMA, hot mix asphalt	SO ₂ , sulfur dioxide
hr, hour	TPH, tons per hour
lbs, pounds	TPY, tons per year
MM, million	VOC, volatile organic compounds

1996 Gencor Ultradrums Rotary Drum Mix Asphalt Plant with Baghouse [SCC 3-05-002-55]

Production Rate: 500 Tons/Hour (Maximum) 550000 tons/year (Restricted Maximum)

Operating Schedule: 1100 Hours/Year (Restricted Maximum)

Dryer fuel Configuration: Diesel [32 MMBtu/hr]

Power Plant: 1760 bhp Primary Diesel-Fired Generator Set (Asphalt Plant & Production Power Supply)

150 bhp Secondary Diesel-Fired Generator Set (Test Trailer Power Supply)

150 bhp Tertiary Diesel-Fired Generator Set (Non-Production Power Supply)

Note: Asphalt Plant May Operate On Utility/commercial Power

Air Flow [Volume] 32,682.33 dscfm [corrected]
 Stack Test Results 0.0131 gr/dscf
 Test Throughput Demonstrated 327 tons/hour

Particulate Emissions: Stack Parameters (controlled)

PM Emissions:

Emission Rate 0.04 gr/dscf [Permit Limit]
 Calculations $(0.04 \text{ gr/dscf}) * (32682.33 \text{ dscfm}) * (60 \text{ min/hr}) * (0.000143 \text{ lb/gr}) = 11.21 \text{ lbs/hr}$
 $(11.21 \text{ lbs/hr}) * (1100 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 6.16 \text{ TPY}$

PM₁₀ Emissions:

Emission Rate 0.012 gr/dscf [30% PM₁₀ to PM, AP-42 Table 11.1-4, 3/04]
 Calculations $(0.012 \text{ gr/dscf}) * (32682.33 \text{ dscfm}) * (60 \text{ min/hr}) * (0.000143 \text{ lb/gr}) = 3.36 \text{ lbs/hr}$
 $(3.36 \text{ lbs/hr}) * (1100 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 1.85 \text{ TPY}$

PM_{2.5} Emissions:

Emission Rate 0.0084 gr/dscf [21% PM_{2.5} to PM, AP-42 Table 11.1-4, 3/04]
 Calculations $(0.0084 \text{ gr/dscf}) * (32682.33 \text{ dscfm}) * (60 \text{ min/hr}) * (0.000143 \text{ lb/gr}) = 2.35 \text{ lbs/hr}$
 $(2.35 \text{ lbs/hr}) * (1100 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 1.29 \text{ TPY}$

Particulate Emissions: Emission Factor Determination (Controlled)

PM Emissions:

Emission Rate 0.033 lbs/ton Asphalt Product [AP-42 Table 11.1-3, 3/04]
 Calculations $(0.033 \text{ lbs/ton}) * (500 \text{ tons/hour}) = 16.50 \text{ lbs/hr}$
 $(16.50 \text{ lbs/hr}) * (1100 \text{ hours/year}) * (0.0005 \text{ tons/lbs}) = 9.08 \text{ TPY}$

PM₁₀ Emissions:

Emission Rate 0.023 lbs/ton Asphalt Product [AP-42 Table 11.1-3, 3/04]
 Calculations $(0.023 \text{ lbs/ton}) * (500 \text{ tons/hour}) = 11.50 \text{ lbs/hr}$
 $(11.50 \text{ lbs/hr}) * (1100 \text{ hours/year}) * (0.0005 \text{ tons/lbs}) = 6.33 \text{ TPY}$

PM_{2.5} Emissions (filterable):

Emission Rate 0.0029 lbs/ton Asphalt Product [AP-42 Table 11.1-4, 3/04]
 Calculations $(0.0029 \text{ lbs/ton}) * (500 \text{ tons/hour}) = 1.45 \text{ lbs/hr}$
 $(3.47 \text{ lbs/hr}) * (1100 \text{ hours/year}) * (0.0005 \text{ tons/lbs}) = 0.80 \text{ TPY}$

PM_{2.5} Emissions (condensable):

Emission Rate 0.0194 lbs/ton Asphalt Product [AP-42 Table 11.1-3, 3/04]
 Calculations $(0.0194 \text{ lbs/ton}) * (500 \text{ tons/hour}) = 9.70 \text{ lbs/hr}$
 $(9.70 \text{ lbs/hr}) * (1100 \text{ hours/year}) * (0.0005 \text{ tons/lbs}) = 5.34 \text{ TPY}$

CO Emissions (uncontrolled):

Emission Factor 0.13 lbs/ton Asphalt Product [AP-42 Table 11.1-7, 3/04]
 Calculations $(0.13 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 65.00 \text{ lbs/hr}$
 $(65.00 \text{ lbs/hr}) * (1100 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 35.75 \text{ TPY}$

NO_x Emissions (uncontrolled):

Emission Factor 0.055 lbs/ton Asphalt Product [AP-42 Table 11.1-7, 3/04]
 Calculations $(0.055 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 27.50 \text{ lbs/hr}$
 $(27.50 \text{ lbs/hr}) * (1100 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 15.13 \text{ TPY}$

SO₂ Emissions (uncontrolled):

Emission Factor 0.0110 lbs/ton Asphalt Product [AP-42 Table 11.1-7, 3/04]
Calculations (0.011 lbs/ton) * (500 tons/hr) = 5.50 lbs/hr
(5.50 lbs/hr) * (1100 hrs/yr) * (0.0005 tons/lb) = 3.03 TPY

VOC Emissions (uncontrolled):

Emission Factor 0.044 lbs/ton Asphalt Product [AP-42 Table 11.1-8, 3/04]
Calculations (0.044 lbs/ton) * (500 tons/hr) = 22.00 lbs/hr
(22.00 lbs/hr) * (1100 hrs/yr) * (0.0005 tons/lb) = 12.10 TPY

CEI-2000A Asphalt Heater [SSC 3-05-002-08]

Fuel Type: Diesel
Burner Firing Rate: 2.74 MMBtu/hr [Maximum Design]
20.0 gallons/hour [Estimated → 19,300 Btu/lb]
Operating Hours: 8760 hrs/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor 2.0 lbs/10³ gallons [AP-42 Table 1.3-1, 5/10]
Calculations (2.0 lbs / 1,000 gal) * (20.0 gal/hr) = 0.04 lbs/hr
(0.040 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.18 TPY

PM₁₀ Emissions:

Emission Factor 1.0 lbs/10³ gallons [AP-42 Table 1.3-6, 5/10]
Calculations (1.0 lbs / 1,000 gal) * (20.0 gal/hr) = 0.02 lbs/hr
(0.020 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.09 TPY

PM_{2.5} Emissions (filterable):

Emission Factor 0.25 lbs/10³ gallons [AP-42 Table 1.3-6, 5/10]
Calculations (0.3 lbs / 1,000 gal) * (20.0 gal/hr) = 0.005 lbs/hr
(0.005 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.02 TPY

PM_{2.5} Emissions (condensable):

Emission Factor 1.30 lbs/10³ gallons [AP-42 Table 1.3-2, 5/10]
Calculations (1.3 lbs / 1,000 gal) * (20.0 gal/hr) = 0.03 lbs/hr
(0.026 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.11 TPY

CO Emissions (uncontrolled):

Emission Factor 5.0 lbs/10³ gallons [AP-42 Table 1.3-1, 5/10]
Calculations (5.0 lbs / 1,000 gal) * (20.0 gal/hr) = 0.10 lbs/hr
(0.100 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.44 TPY

NO_x Emissions (uncontrolled):

Emission Factor 20 lbs/10³ gallons [AP-42 Table 1.3-1, 5/10]
Calculations (20.0 lbs / 1,000 gal) * (20.0 gal/hr) = 0.40 lbs/hr
(0.40 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 1.75 TPY

SO₂ Emissions (uncontrolled):

Emission Factor 142 *(S) lbs/10³ gallons* [AP-42 Table 1.3-1, 5/10]
 Calculations (142.0 lbs/1000 gal) * (1.93% S) * (20.0 gal/hr) = 5.48 lbs/hr
 (5.48 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 24.00 TPY
 * Based on maximum allowable sulfur content under ARM 17.8.322 @ 1.93% [wgt]

VOC Emissions (uncontrolled):

Emission Factor 0.252 lbs/10³ gallons [AP-42 Table 1.3-3, 5/10]
 Calculations (0.252 lbs / 1,000 gal) * (20.0 gal/hr) = 0.01 lbs/hr
 (0.005 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) = 0.022 TPY

Aggregate Handling & Load-in [SCC 30500216]

Process Rate: 500 tons/hour
 Number of Piles: 2 pile Transfers [Initial Pile Load-In → Aggregate Load-Out to Feed Bin]
 Operating Hours: 1100 hours/year

Particulate Emissions (controlled):

Emission Factor $EF = k (0.0032) * [(U/5)^{1.3} / (M / 2)^{1.4}]$ [AP-42 13.2.4, 11/06]

where: EF, Emission Factor = lbs Emitted / ton Processed

k, Dimensionless Particle Size Multiplier PM = 0.74 [AP-42 13.2.4, 11/06]
 k, Dimensionless Particle Size Multiplier PM₁₀ = 0.35 [AP-42 13.2.4, 11/06]
 k, Dimensionless Particle Size Multiplier PM_{2.5} = 0.053 [AP-42 13.2.4, 11/06]
 U, Mean Wind Speed (mph) = 9.3 [ASOS/AWOS AVE-MT 10 yr Ave.]
 M, Material Moisture Content (%) = 2.1 [AP-42 13.2.4-1, 11/06]

PM Emissions:

Emission Factor $EF = 0.74 * (0.0032) * [(9.33/5)^{1.3} / (2.1 / 2)^{1.4}] =$ 0.0050 lbs/ton
 Calculations (0.0050 lbs/ton) * (500 tons/hr) * (2 pile) = 4.98 lbs/hr
 (4.98 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 2.74 TPY

PM₁₀ Emissions:

Emission Factor $EF = 0.35 * (0.0032) * (7.0/5)^{1.3} / (2.1 / 2)^{1.4} =$ 0.0024 lbs/ton
 Calculations (0.0024 lbs/ton) * (500 tons/hr) * (2 pile) = 2.35 lbs/hr
 (2.35 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 1.29 TPY

PM_{2.5} Emissions:

Emission Factor $EF = 0.053 * (0.0032) * (7.0/5)^{1.3} / (2.1 / 2)^{1.4} =$ 0.0004 lbs/ton
 Calculations (0.0004 lbs/ton) * (500 tons/hr) * (2 pile) = 0.36 lbs/hr
 (0.36 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.20 TPY

Aggregate Screening & Conveyor Transfer [SCC 3-05-020-02 & 3-05-

Process Rate: 500 tons/hour
 Number of Transfers: 2 Transfers
 Operating Hours: 1100 hours/year

Particulate Emissions (controlled):

PM Emissions:

Emission Factor 0.0023 lbs/ton transferred [AP-42 Table 11.19.2-2, 8/04]
 Calculations (0.00234 lbs/ton) * (500 tons/hr) * (2 Transfers) = 2.34 lbs/hr
 (2.34 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 1.29 TPY

PM₁₀ Emissions:

Emission Factor 0.00079 lbs/ton transferred [AP-42 Table 11.19.2-2, 8/04]
 Calculations (0.00079 lbs/ton) * (500 tons/hr) * (2 Transfers) = 0.79 lbs/hr
 (0.79 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.43 TPY

PM_{2.5} Emissions:

Emission Factor 0.000513 lbs/ton transferred [AP-42 Table 11.19.2-2, 8/04]
 Calculations (0.000513 lbs/ton) * (500 tons/hr) * (2 Transfers) = 0.51 lbs/hr
 (0.51 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.28 TPY

Lime Silo Product transfer & Conveying [SCC 3-05-016-24]

Process Rate: 500 tons/hour
 Operating Hours: 1100 hours/year

Particulate Emissions (controlled):

PM Emissions:

Emission Factor 0.000088 lbs/ton material transferred [AP-42 Table 11.17-4, 2/98]
 Calculations (0.000088 lbs/ton) * (500 tons/hr) = 0.044 lbs/hr
 (0.04 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.02 TPY

PM₁₀ Emissions:

Emission Factor 0.000088 lbs/ton material transferred [AP-42 Table 11.17-4, 2/98]
 Calculations (0.000088 lbs/ton) * (500 tons/hr) = 0.044 lbs/hr
 (0.04 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.02 TPY

PM_{2.5} Emissions:

Emission Factor 0.000088 lbs/ton material transferred [AP-42 Table 11.17-4, 2/98]
 Calculations (0.000088 lbs/ton) * (500 tons/hr) = 0.04 lbs/hr
 (0.04 lbs/hr) * (1100 hrs/year) * (0.0005 lbs/ton) = 0.02 TPY

Asphalt Storage & Silo Filling [SCC 3-05-002-13]

Process Rate: 500 tons/hour
 Operating Schedule: 1100 tons/year

Particulate Emissions (uncontrolled):

Emission Factor $EF = 0.000332 + 0.00105(-V)e^{((0.0251)(T+460)-20.43)}$ [AP-42 Table 11.1-14, 3/04]
 where: EF, Emission Factor = lbs emitted / ton HMA produced
 V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]
 T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]

PM Emissions:

Emission Factor $EF = 0.000332 + 0.00105 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ = 0.00059 lbs/ton HMA
 Calculations (0.00059 lbs/ton) * (500 tons/hr) = 0.29 lbs/hr
 (0.29 lbs/hr) * (1100 tons/year) * (0.0005 lbs/ton) = 0.16 TPY

PM₁₀ Emissions:

Emission Factor	$EF = 0.000332 + 0.00105 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.00059 lbs/ton HMA
Calculations	$(0.00059 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	0.29 lbs/hr
	$(0.29 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	0.16 TPY

PM_{2.5} Emissions:

Emission Factor	$EF = 0.000332 + 0.00105 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.00059 lbs/ton HMA
Calculations	$(0.00059 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	0.29 lbs/hr
	$(0.29 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	0.16 TPY

CO Emissions (uncontrolled):

Emission Factor	$EF = 0.00488(-V)e^{((0.0251)(T+460)-20.43)}$	[AP-42 Table 11.1-14, 3/04]
	where: EF, Emission Factor = lbs Emitted / ton Processed	
	V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]	
	T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]	

Emission Factor	$EF = 0.00488 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.0012 lbs/ton HMA
Calculations	$(0.0012 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	0.59 lbs/hr
	$(0.59 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	0.32 TPY

VOC Emissions (uncontrolled):

Emission Factor	$EF = 0.0504(-V)e^{((0.0251)(T+460)-20.43)}$	[AP-42 Table 11.1-14, 3/04]
	where: EF, Emission Factor = lbs Emitted / ton Processed	
	V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]	
	T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]	

Emission Factor	$EF = 0.0504 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.0122 lbs/ton HMA
Calculations	$(0.0122 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	6.09 lbs/hr
	$(6.09 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	3.35 TPY

Asphalt Plant Load-Out [SCC 3-05-002-14]

Process Rate: 500 tons/hour
 Operating Schedule: 1100 hours/year

Particulate Emissions (uncontrolled):

Emission Factor	$EF = 0.000181 + 0.00141(-V)e^{((0.0251)(T+460)-20.43)}$	[AP-42 Table 11.1-14, 3/04]
	where: EF, Emission Factor = lbs emitted / ton HMA produced	
	V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]	
	T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]	

PM Emissions:

Emission Factor	$EF = 0.000181 + 0.00141 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.00052 lbs/ton HMA
Calculations	$(0.00052 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	0.26 lbs/hr
	$(0.26 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	0.14 TPY

PM₁₀ Emissions:

Emission Factor	$EF = 0.000181 + 0.00141 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)}$ =	0.00052 lbs/ton HMA
Calculations	$(0.00052 \text{ lbs/ton}) * (500 \text{ tons/hr}) =$	0.26 lbs/hr
	$(0.26 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) =$	0.14 TPY

PM_{2.5} Emissions:

Emission Factor $EF = 0.000181 + 0.00141 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)} = 0.00052$ lbs/ton HMA
Calculations $(0.00052 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 0.26$ lbs/hr
 $(0.26 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) = 0.14$ TPY

CO Emissions (uncontrolled):

Emission Factor $EF = 0.00558(-V)e^{((0.0251)(T+460)-20.43)}$ [AP-42 Table 11.1-14, 3/04]
where: EF, Emission Factor = lbs Emitted / ton Processed
V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]
T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]

Emission Factor $EF = 0.00558 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)} = 0.00135$ lbs/ton HMA
Calculations $(0.00135 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 0.67$ lbs/hr
 $(0.67 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) = 0.37$ TPY

VOC Emissions (uncontrolled):

Emission Factor $EF = 0.0172(-V)e^{((0.0251)(T+460)-20.43)}$ [AP-42 Table 11.1-14, 3/04]
where: EF, Emission Factor = lbs Emitted / ton Processed
V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]
T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]

Emission Factor $EF = 0.0172 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)} = 0.00416$ lbs/ton HMA produced
Calculations $(0.00416 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 2.08$ lbs/hr
 $(2.08 \text{ lbs/hr}) * (1100 \text{ tons/year}) * (0.0005 \text{ lbs/ton}) = 1.14$ TPY

Diesel Generator Engines [SCC 2-02-001-02]

Primary Diesel-Fired Generator Set (Asphalt Plant & Production Power Supply)

Engine Rating: 1760 bhp [Design Maximum Output]
Fuel 12.32 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
89.9 gallons/hour [Estimated →19,300 Btu/lb]
Operating Hours: 2000 hours/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations $(0.0022 \text{ lb/hp-hr}) * (1760 \text{ hp}) = 3.87$ lbs/hr
 $(3.87 \text{ lbs/hr}) * (2000 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 3.87$ TPY

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations $(0.0022 \text{ lb/hp-hr}) * (1760 \text{ hp}) = 3.87$ lbs/hr
 $(3.87 \text{ lbs/hr}) * (2000 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 3.87$ TPY

PM_{2.5} Emissions (filterable):

Emission Factor 0.0479 lb/MMBtu [AP-42 Table 3.4-2, 10/96]
Calculations $(0.0479 \text{ lb/MMBtu}) * (0.00 \text{ MMBtu/hr}) = 0.59$ lbs/hr
 $(0.59 \text{ lbs/hr}) * (2000 \text{ hrs/yr}) * (0.0005 \text{ tons/lb}) = 0.59$ TPY

PM_{2.5} Emissions (condensable):

Emission Factor 0.0077 lb/MMBtu [AP-42 Table 3.4-2, 10/96]
Calculations (0.0077 lb/MMBtu) * (12.32 MMBtu/hr) = 0.09 lbs/hr
(0.09 lbs/hr) * (2000 hrs/yr) * (0.0005 tons/lb) = 0.09 TPY

CO Emissions (controlled):

Emission Factor 0.00668 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.00668 lb/hp-hr) * (1760 hp) = 11.76 lbs/hr
(11.76 lbs/hr) * (2000 hrs/yr) * (0.0005 tons/lb) = 11.76 TPY

NOx Emissions (uncontrolled):

Emission Factor 0.031 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.031 lb/hp-hr) * (1760 hp) = 54.56 lbs/hr
(54.56 lbs/hr) * (2000 hrs/yr) * (0.0005 tons/lb) = 54.56 TPY

SO₂ Emissions (uncontrolled):

Emission Factor 0.00205 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.0021 lb/hp-hr) * (1760 hp) = 3.61 lbs/hr
(3.61 lbs/hr) * (2000 hrs/yr) * (0.0005 tons/lb) = 3.61 TPY

VOC Emissions (uncontrolled):

Emission Factor 0.002514 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.0025 lb/hp-hr) * (1760 hp) = 4.42 lbs/hr
(4.42 lbs/hr) * (2000 hrs/yr) * (0.0005 tons/lb) = 4.42 TPY

Secondary Diesel-Fired Generator Set (Test Trailer Power Supply)

Engine Rating: 150 bhp [Design Maximum Output]
Fuel Input: 1.05 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
7.7 gallons/hour [Estimated →19,300 Btu/lb]
Operating Hours: 5800 hours/year

Particulate Emissions(uncontrolled):

PM Emissions:
Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.0022 lb/hp-hr) * (150 hp) = 0.33 lbs/hr
(0.33 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) = 0.96 TPY

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations (0.0022 lb/hp-hr) * (150 hp) = 0.33 lbs/hr
(0.33 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) = 0.96 TPY

PM_{2.5} Emissions (filterable):

Emission Factor 0.0479 lb/MMBtu [AP-42 Table 3.4-2, 10/96]
Calculations (0.0479 lb/MMBtu) * (0.00 MMBtu/hr) = 0.05 lbs/hr
(0.05 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) = 0.15 TPY

PM_{2.5} Emissions (condensable):

Emission Factor	0.0077 lb/MMBtu	[AP-42 Table 3.4-2, 10/96]	
Calculations	(0.0077 lb/MMBtu) * (1.05 MMBtu/hr) =		0.01 lbs/hr
	(0.01 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.02 TPY

CO Emissions (uncontrolled):

Emission Factor	0.00668 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.00668 lb/hp-hr) * (150 hp) =		1.00 lbs/hr
	(1.00 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		2.91 TPY

NO_x Emissions (uncontrolled):

Emission Factor	0.031 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.031 lb/hp-hr) * (150 hp) =		4.65 lbs/hr
	(4.65 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		13.49 TPY

SO₂ Emissions (uncontrolled):

Emission Factor	0.00205 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0021 lb/hp-hr) * (150 hp) =		0.31 lbs/hr
	(0.31 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.89 TPY

VOC Emissions (uncontrolled):

Emission Factor	0.002514 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0025 lb/hp-hr) * (150 hp) =		0.38 lbs/hr
	(0.38 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		1.09 TPY

Tertiary Diesel-Fired Generator Set (Non-Production Power Supply)

Engine Rating:	150 bhp [Design Maximum Output]
Fuel Input:	1.05 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
	7.7 gallons/hour [Estimated →19,300 Btu/lb]
Operating Hours:	5800 hours/year

Particulate Emissions (uncontrolled):

PM Emissions:

Emission Factor	0.0022 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0022 lb/hp-hr) * (150 hp) =		0.33 lbs/hr
	(0.33 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.96 TPY

PM₁₀ Emissions:

Emission Factor	0.0022 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0022 lb/hp-hr) * (150 hp) =		0.33 lbs/hr
	(0.33 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.96 TPY

PM_{2.5} Emissions (filterable):

Emission Factor	0.0479 lb/MMBtu	[AP-42 Table 3.4-2, 10/96]	
Calculations	(0.0479 lb/MMBtu) * (0.00 MMBtu/hr) =		0.05 lbs/hr
	(0.05 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.15 TPY

PM_{2.5} Emissions (condensable):

Emission Factor	0.0077 lb/MMBtu	[AP-42 Table 3.4-2, 10/96]	
Calculations	(0.0077 lb/MMBtu) * (1.05 MMBtu/hr) =		0.01 lbs/hr
	(0.01 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.02 TPY

CO Emissions (uncontrolled):

Emission Factor	0.00668 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.00668 lb/hp-hr) * (150 hp) =		1.00 lbs/hr
	(1.00 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		2.91 TPY

NO_x Emissions (uncontrolled):

Emission Factor	0.031 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.031 lb/hp-hr) * (150 hp) =		4.65 lbs/hr
	(4.65 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		13.49 TPY

SO₂ Emissions (uncontrolled):

Emission Factor	0.00205 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0021 lb/hp-hr) * (150 hp) =		0.31 lbs/hr
	(0.31 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		0.89 TPY

VOC Emissions (uncontrolled):

Emission Factor	0.002514 lb/hp-hr	[AP-42 Table 3.3-1, 10/96]	
Calculations	(0.0025 lb/hp-hr) * (150 hp) =		0.38 lbs/hr
	(0.38 lbs/hr) * (5800 hrs/yr) * (0.0005 tons/lb) =		1.09 TPY

Unpaved Roadways (Haul Roads) - Secondary Emissions

Miles Travelled: 5 Miles/Day [Estimate]
Vehicle Weight: 50 Tons [Mean Vehicle Weight Empty/Full]
Control Method: Water Application
Control Efficiency (C_e): 50

Particulate Emissions (controlled):

Emission Factor	$EF = k(s/12)^a * (W/3)^b$	[AP-42 Table 13.2.2.2, 11/06]	
where:	EF, Emission Factor = lbs Emitted Per Vehicle Mile Traveled (VMT)		
	k, Empirical Constant PM =	4.9 [AP-42 Table 13.2.2-2, 11/06]	
	k, Empirical Constant PM ₁₀ =	1.5 [AP-42 Table 13.2.2-2, 11/06]	
	k, Empirical Constant PM _{2.5} =	0.15 [AP-42 Table 13.2.2-2, 11/06]	
	s, Surface Material Silt Content (%) =	7.1 [AP-42 Table 13.2.2-1, 11/06]	
	W, Mean Vehicle Weight (tons) =	50 [Applicant Provided Data]	
	a, Empirical Constant PM =	0.7 [AP-42 Table 13.2.2-2, 11/06]	
	a, Empirical Constant PM ₁₀ /PM _{2.5} =	0.9 [AP-42 Table 13.2.2-2, 11/06]	
	b, Empirical Constant PM - PM _{2.5} =	0.45 [AP-42 Table 13.2.2-2, 11/06]	

PM Emissions:

Emission Factor	$EF = 4.9 * (7.1/12)^{0.7} * (50/3)^{0.45} =$	12.04 lbs/VMT	
Calculations	(12.04 lbs/VMT) * (5 miles/day) * (1 - 0.5 C _e) =		30.09 lbs/day
	(30.09 lbs/day) * (365 days/yr) * (0.0005 tons/lb) =		5.49 TPY

PM₁₀ Emissions:

Emission Factor	$EF = 1.5 * (7.1/12)^{0.9} * (50/3)^{0.45} =$	3.32 lbs/VMT	
Calculations	$(3.32 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 \text{ Ce}) =$		8.29 lbs/day
	$(8.29 \text{ lbs/day}) * (365 \text{ days/yr}) * (0.0005 \text{ tons/lb}) =$		1.51 TPY

PM_{2.5} Emissions:

Emission Factor	$EF = 0.15 * (7.1/12)^{0.9} * (50/3)^{0.45} =$	0.33 lbs/VMT	
Calculations	$(0.33 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 \text{ Ce}) =$		0.83 lbs/day
	$(0.83 \text{ lbs/day}) * (365 \text{ days/yr}) * (0.0005 \text{ tons/lb}) =$		0.15 TPY

V. Existing Air Quality

The home-pit location of this portable source is Section 25, Township 4 North, Range 10 West in Deer Lodge County, Montana. The initial location and those areas for which this facility is permitted to operate under MAQP #2542-05 has been designated unclassified/attainment with all ambient air quality standards and there are no major air pollution sources in the surrounding area.

Addendum #1 to this permit will apply to the source while operating in or within 10 km of any nonattainment area during the summer season (April 1 – September 30).

VI. Air Quality Impacts

MAQP #2542-05 covers operation of this asphalt plant while operating in areas within Montana that are classified as attainment or unclassifiable with federal ambient air quality standards, excluding counties that have a Department-approved permitting program and areas that are tribal lands. This permit contains conditions and limitations that would protect air quality, and would limit the facility's emissions below the major source threshold. Furthermore, this facility is a portable source that would operate on an intermittent and temporary basis, so any effects to air quality will be minor and of limited duration.

If the source locates and operates in or within 10 km of any PM₁₀ nonattainment area, Gilman will be required to operate in accordance with MAQP #2542-05 and Addendum #1, which includes more stringent limits and conditions to ensure that the proposed operation does not result in additional degradation of air quality in the affected nonattainment area. A more detailed discussion and analysis of ambient impacts from operations locating in or within 10 km of certain PM₁₀ nonattainment areas is contained in the Addendum Analysis to Addendum #1 of MAQP #2542-05.

VII. Ambient Air Impact Analysis

The Department determined that there will be no significant impact from this permit action because this permitting action is considered an administrative action. Furthermore, the Department believes that the amount of emissions generated by this project will not exceed any set ambient standard.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

IX. Environmental Assessment

The permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an environmental assessment is not required.

Permit Analysis Prepared by: D. Kuenzli

Date: May 21, 2012

Addendum #1
Jim Gilman Excavating, Inc.
Montana Air Quality Permit (MAQP) #2542-05

An addendum to MAQP #2542-05 is issued to Jim Gilman Excavating, Inc. (Gilman), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

I. Permitted Equipment

Gilman owns and operates a portable rotary drum-mix asphalt plant and baghouse with a maximum rated design capacity of 500 tons per hour (TPH) of asphalt production.

II. Seasonal and Site Restrictions

Addendum #1 applies to the Gilman facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas. Additionally, seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1 – March 31), Gilman shall not operate in or within 10 km of any listed PM₁₀ nonattainment area.
- B. During the summer season (April 1 – September 30) – Gilman may operation at any locations in or within 10 km of the Butte, Columbia Falls, Kalispell, Libby, Thompson Falls, and Whitefish PM₁₀ nonattainment areas.
- C. Gilman shall comply with the limitations and conditions contained in Addendum #1 to MAQP #2542-05 while operating in or within 10 km of any of the previously identified PM₁₀ nonattainment areas. Addendum #1 shall be valid until revoked or modified. The Department of Environmental Quality (Department) reserves the authority to modify Addendum #1 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

- A. Operational Limitations and Conditions – **Summer Season** (April 1 – September 30)
 - 1. Asphalt plant particulate matter emissions shall be limited to 0.040 grains per dry standard cubic feet (gr/dscf) (ARM 17.8.752 and 40 Code of Federal Regulations (CFR) 60, Subpart I).
 - 2. All visible emissions from the asphalt plant stack shall not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
 - 3. Gilman shall not cause or authorize to be discharged into the atmosphere from any equipment, such as 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, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).

4. Gilman shall not cause or authorize to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant area, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
5. Gilman shall treat all unpaved portions of the haul roads, access roads, parking lots, and general plant area with water and/or chemical dust suppressant, as necessary to maintain compliance with the 10% opacity limitation contained in Section III.A.4 (ARM 17.8.749).
6. Hot-mix asphalt production shall not exceed 12,000 tons during any rolling 24-hour time period (ARM 17.8.749).

B. Operational Reporting Requirements

1. If this asphalt plant is moved to another nonattainment location, an Intent to Transfer form must be sent to the Department and a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.749 and ARM 17.8.765).
2. Production information for the sites covered by this addendum must be maintained for five years and submitted to the Department upon request. The information must include (ARM 17.8.749):
 - a. Daily tons of asphalt production at each site. Gilman shall document, by day, the total asphalt production. Gilman shall sum the total asphalt production for the previous day to demonstrate compliance with the limitations in Sections III.A.6.
 - b. Daily hours of operation at each site.
 - c. Daily hours of operation and the hp for each engine at each site.
 - d. Daily tons of bulk material loaded at each site (production).
 - e. Fugitive dust information consisting of the daily total miles driven on unpaved roads within the operating site for all plant vehicles.

Addendum #1 Analysis
Jim Gilman Excavating, Inc.
Montana Air Quality Permit (MAQP) #2542-05

I. Permitted Equipment

Jim Gilman Excavating, Inc. (Gilman) owns and operates a portable rotary drum-mix asphalt plant and baghouse with a maximum rated design capacity of 500 tons per hour (TPH) of asphalt production.

II. Source Description

Gilman proposes to use this asphalt plant in the production of hot-mix asphalt. For a typical operational set-up, aggregate materials are fed via conveyor to the drum mixer, where the aggregate is dried and heated. Subsequently, mineral filler and asphalt oil are introduced into the drum mixer. Mineral filler is delivered from a storage silo to the drum via an enclosed feed auger system. Particulate emissions from the mineral filler storage and feeder system, as well as drum mixer, are routed to a baghouse for control. The raw materials are introduced into the drum mixer and continuously mixed and heated by the drum mixer until desired properties are obtained.

After heating and mixing is complete, the asphalt product is transferred from the drum mixer to the asphalt product silo, where the asphalt remains until it is loaded into trucks for transport. The operation is powered through the use of on-site diesel-fired engine generators.

III. Applicable Rules and Regulations

The following are partial quotations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Montana Department of Environmental Quality (Department). Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

ARM 17.8, Subchapter 7 – Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

- A. ARM 17.8.749 Conditions for Issuance of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
- B. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
- C. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one location to another if:
 - 1. Written notice of Intent to Transfer location and proof of public notice are sent to the Department;

2. The source will operate in the new location for a period of less than 1 year; and
3. The source will not have any significant impact on any nonattainment area or any Class I area.

IV. Emission Inventory

Summer Season [April 1 – September 30] ^(a)		
Emission Source	PM ₁₀ Emissions	
	(lbs/hr)	(lbs/day)
Rotary Drum Mix Asphalt Plant w/ Venturi Scrubber	11.50	276.00
Hwy 88 Asphalt Heater	0.02	0.48
Aggregate Handling & Storage Piles	2.35	56.49
Aggregate Screening & Conveying	0.79	18.86
Lime Silo transfer & Conveying	0.44	1.06
Asphalt Storage & Handling	0.29	7.03
Asphalt Load-Out	0.26	6.26
Primary Diesel Engine [≤ 1,760 bhp]	3.87	92.93
Secondary Diesel Engine	0.33	7.92
Tertiary Diesel Engine	0.33	7.92
Unpaved Roadways	--	8.29
TOTAL EMISSIONS ►	19.79	483.24

^(a) Emission Inventory reflects operation of the asphalt plant and associated equipment on a 24 hour schedule to demonstrate that potential PM₁₀ emissions are below 547 pounds per day threshold.

ASOS, Automated Surface Observing System	PTE, Potential To Emit
AWOS, Automated Weather Observing System	PM, particulate matter
bhp, brake-horsepower	PM ₁₀ , particulate matter with an aerodynamic diameter of 10 microns or less
Btu, million British Thermal Units	SO ₂ , sulfur dioxide
dscf, dry standard cubic feet	TPH, tons per hour
g, grams	TPY, tons per year
gr, grains	VOC, volatile organic compounds
HMA, hot mix asphalt	
hr, hour	
lbs, pounds	
MM, million	

1996 Gencor Ultradrums Rotary Drum Mix Asphalt Plant with Baghouse [SCC 3-05-002-55]

Production Rate: 500 Tons/Hour (Maximum) 12,000 Tons/Day (Maximum)

Operating Schedule: 24 Hours/Day (Restricted Maximum)

Dryer fuel Configuration: Diesel [32 MMBtu/hr]

Power Plant: 1760 bhp Primary Diesel-Fired Generator Set (Asphalt Plant & Production Power Supply)

150 bhp Secondary Diesel-Fired Generator Set (Test Trailer Power Supply)

150 bhp Tertiary Diesel-Fired Generator Set (Non-Production Power Supply)

Note: Asphalt Plant May Operate On Utility/commercial Power

PM₁₀ Emissions:

Emission Rate 0.023 lbs/ton Asphalt Product [AP-42 Table 11.1-3, 3/04]

Calculations (0.023 lbs/ton) * (500 tons/hour) = 11.50 lbs/hr (controlled)

(11.50 lbs/hr) * (24 hours/day) = 276.00 lbs/day (controlled)

CEI-2000A Asphalt Heater [SSC 3-05-002-08]

Fuel Type: Diesel

Burner Firing Rate: 2.74 MMBtu/hr [Maximum Design]
20.0 gallons/hour [Estimated → 19,300 Btu/lb]

PM₁₀ Emissions:

Emission Factor 1.0 lbs/10³ gallons [AP-42 Table 1.3-6, 5/10]
Calculations (1.0 lbs / 1,000 gal) * (20.0 gal/hr) = 0.02 lbs/hr (uncontrolled)
(0.02 lbs/hr) * (24 hours/day) = 0.48 lbs/day (uncontrolled)

Aggregate Handling & Load-in [SCC 30500216]



Process Rate: 500 tons/hour
Number of Piles: 2 pile Transfers [Initial Pile Load-In → Aggregate Load-Out to Feed Bin]

Emission Factor $EF = k (0.0032) * [(U/5)^{1.3} / (M / 2)^{1.4}]$ [AP-42 13.2.4, 11/06]

where: EF, Emission Factor = lbs Emitted / ton Processed
k, Dimensionless Particle Size Multiplier PM₁₀ = 0.35 [AP-42 13.2.4, 11/06]
U, Mean Wind Speed (mph) = 9.3 [ASOS/AWOS AVE-MT 10 yr Ave.]
M, Material Moisture Content (%) = 2.1 [AP-42 13.2.4-1, 11/06]

PM₁₀ Emissions:

Emission Factor $EF = 0.35 * (0.0032) * (7.0/5)^{1.3} / (2.1 / 2)^{1.4} = 0.0024$ lbs/ton
Calculations (0.0024 lbs/ton) * (500 tons/hr) * (2 pile) = 2.35 lbs/hr (uncontrolled)
(2.35 lbs/hr) * (24 hours/day) = 56.49 lbs/day (uncontrolled)

Aggregate Screening & Conveyor Transfer [SCC 3-05-020-02 & 3-05-

Process Rate: 500 tons/hour
Number of Transfers: 2 Transfers

PM₁₀ Emissions (controlled):

Emission Factor 0.00079 lbs/ton transferred [AP-42 Table 11.19.2-2, 8/04]
Calculations (0.00079 lbs/ton) * (500 tons/hr) * (2 Transfers) = 0.79 lbs/hr (controlled)
(0.79 lbs/hr) * (24 hours/day) = 18.86 lbs/day (controlled)

Lime Silo Product transfer & Conveying [SCC 3-05-016-24]

Process Rate: 500 tons/hour

PM₁₀ Emissions (controlled):

Emission Factor 0.000088 lbs/ton material transferred [AP-42 Table 11.17-4, 2/98]
Calculations (0.000088 lbs/ton) * (500 tons/hr) = 0.044 lbs/hr (controlled)
(0.04 lbs/hr) * (24 hours/day) = 1.06 lbs/day (controlled)

Asphalt Storage & Silo Filling [SCC 3-05-002-13]

Process Rate: 500 tons/hour

Emission Factor $EF = 0.000332 + 0.00105(-V)e^{((0.0251)(T+460)-20.43)}$ [AP-42 Table 11.1-14, 3/04]

where: EF, Emission Factor = lbs emitted / ton HMA produced
V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]
T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]

PM₁₀ Emissions:

Emission Factor $EF = 0.000332 + 0.00105 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)} = 0.00059$ lbs/ton HMA
Calculations $(0.00059 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 0.29$ lbs/hr (uncontrolled)
 $(0.29 \text{ lbs/hr}) * (24 \text{ hours/day}) = 7.03$ lbs/day (uncontrolled)

Asphalt Plant Load-Out [SCC 3-05-002-14]

Process Rate: 500 tons/hour

Emission Factor $EF = 0.000181 + 0.00141(-V)e^{((0.0251)/(T+460)-20.43)}$ [AP-42 Table 11.1-14, 3/04]
where: EF, Emission Factor = lbs emitted / ton HMA produced
V, Asphalt Volatility = -0.05 [Default value AP-42 Table 11.1-14, 3/04]
T, HMA temperature = 325°F [Default value AP-42 Table 11.1-14, 3/04]

PM₁₀ Emissions:

Emission Factor $EF = 0.000181 + 0.00141 * (0.05) * e^{((0.0251) * (325 + 460) - 20.43)} = 0.00052$ lbs/ton HMA
Calculations $(0.00052 \text{ lbs/ton}) * (500 \text{ tons/hr}) = 0.26$ lbs/hr (uncontrolled)
 $(0.26 \text{ lbs/hr}) * (24 \text{ hours/day}) = 6.26$ lbs/day (uncontrolled)

Diesel Generator Engines [SCC 2-02-001-02]

Primary Diesel-Fired Generator Set (Asphalt Plant & Production Power Supply)

Engine Rating: 1760 bhp [Design Maximum Output]
Fuel Input: 12.32 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
89.9 gallons/hour [Estimated →19,300 Btu/lb]

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations $(0.0022 \text{ lb/hp-hr}) * (1760 \text{ hp}) = 3.87$ lbs/hr (uncontrolled)
 $(3.87 \text{ lbs/hr}) * (24 \text{ hours/day}) = 92.93$ lbs/day (uncontrolled)

Secondary Diesel-Fired Generator Set (Test Trailer Power Supply)

Engine Rating: 150 bhp [Design Maximum Output]
Fuel Input: 1.05 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
7.7 gallons/hour [Estimated →19,300 Btu/lb]

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations $(0.0022 \text{ lb/hp-hr}) * (150 \text{ hp}) = 0.33$ lbs/hr (uncontrolled)
 $(0.33 \text{ lbs/hr}) * (24 \text{ hours/day}) = 7.92$ lbs/day (uncontrolled)

Tertiary Diesel-Fired Generator Set (Non-Production Power Supply)

Engine Rating: 150 bhp [Design Maximum Output]
Fuel Input: 1.05 MMBtu/hr [BSFC →7,000 Btu/hp-hr]
7.7 gallons/hour [Estimated →19,300 Btu/lb]

PM₁₀ Emissions:

Emission Factor 0.0022 lb/hp-hr [AP-42 Table 3.3-1, 10/96]
Calculations $(0.0022 \text{ lb/hp-hr}) * (150 \text{ hp}) = 0.33$ lbs/hr (uncontrolled)
 $(0.33 \text{ lbs/hr}) * (24 \text{ hours/day}) = 7.92$ lbs/day (uncontrolled)

Unpaved Roadways (Haul Roads) - Secondary Emissions

Miles Travelled: 5 Miles/Day [Estimate]
Vehicle Weight: 50 Tons [Mean Vehicle Weight Empty/Full]
Control Method: Water Application
Control Efficiency (C_e): 50%

Emission Factor $EF = k(s/12)^a * (W/3)^b$ [AP-42 13.2.2.2, 11/06]
where: EF, Emission Factor = lbs Emitted Per Vehicle Mile Traveled (VMT)
k, Empirical Constant PM₁₀ = 1.5 [AP-42 Table 13.2.2-2, 11/06]
s, Surface Material Silt Content (%) = 7.1 [AP-42 Table 13.2.2-1, 11/06]
W, Mean Vehicle Weight (tons) = 50 [Applicant Provided Data]
a, Empirical Constant PM₁₀/PM_{2.5} = 0.9 [AP-42 Table 13.2.2-2, 11/06]
b, Empirical Constant PM - PM_{2.5} = 0.45 [AP-42 Table 13.2.2-2, 11/06]

PM₁₀ Emissions:

Emission Factor $EF = 1.5 * (7.1/12)^{0.9} * (50/3)^{0.45} = 3.32$ lbs/VMT
Calculations $(3.32 \text{ lbs/VMT}) * (5 \text{ miles/day}) * (1 - 0.5 C_e) = 8.29$ lbs/day (controlled)

V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀). Due to exceedance of the national standards for PM₁₀, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM₁₀. As a result of this designation, the EPA required the Department and the City-County Health Departments to submit PM₁₀ State Implementation Plans (SIP). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies identified these sources to be the major contributors to PM₁₀ emissions.

MAQP #2542-05 and Addendum #1 are for a portable hot-mix asphalt plant that will potentially operate at sites in or within 10 km of certain PM₁₀ nonattainment areas. The more stringent operating conditions contained in the addendum will minimize any potential impact on the nonattainment areas and will protect the national ambient air quality standards. Also, this facility is a portable source that would operate on an intermittent and temporary basis and any effects on air quality will be minor and short-lived.

VI. Air Quality Impacts

MAQP #2542-05 and Addendum #1 will cover the operations of this portable hot-mix asphalt plant while operating at any location within Montana, excluding those counties that have a Department approved permitting program.

Addendum #1 will cover the operations of this portable hot-mix asphalt plant, while operating in or within 10 km of any nonattainment area during the summer months.

VII. Taking or Damaging Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment (see Section VIII of the Permit Analysis for MAQP #2542-05) and determined there are no taking or damaging implications.

VIII. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an environmental assessment is not required.

Addendum Analysis Prepared By: D. Kuenzli

Date: May 21, 2012