

Puget Sound Clean Air Agency

Notice of
Construction No.

11613

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 10130

Date

DRAFT

Replacement of equipment at an existing Asphalt Plant consisting of: one (1) existing Aesco Madsen rotary aggregate dryer rated at 55,000 cfm (300 tons/hr; 96.8 MMBtu/hr); one (1) new Aesco Madsen rotary drum mixer rated at up to 300 tons/hr connected to an existing Standard Steel AB-704-15 baghouse rated at 62,000 cfm; and new recycled asphalt pavement (RAP) feeder bin (120 tons/hr).

APPLICANT

Puget Paving
10817 26th Ave South
Lakewood, WA 98499

OWNER

Puget Paving
10817 26th Ave South
Lakewood, WA 98499

INSTALLATION ADDRESS

Puget Paving, 5625 189th St E, Puyallup, WA 98373

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

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3. Puget Paving shall comply with the requirements of 40 CFR Part 60, Subparts I and A.

BACT

4. Puget Paving shall vent the rotary drum mixer and storage silos to the Standard Steel Baghouse.
5. The Aesco Madsen Rotary Dryer shall be fired only on natural gas.
6. The existing H&B Pug Mill Mixer shall be removed from service prior to the first operation of the Aesco Madsen Rotary Mixer. A record of the date of the last operation of the existing H&B Pug Mill Mixer and the date of the first operation of the new Aesco Madsen Rotary Mixer shall be kept on file for Agency inspection.
7. The following emission limitations are set on the mixer stack:
 - a) Total particulate matter emissions shall not exceed 0.027 gr/dscf (corrected to 7% O₂) as measured by U.S. EPA Method 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983.

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b) Filterable particulate matter emissions shall not exceed 0.014 gr/dscf (corrected to 7% O₂) as measured by U.S. EPA Method 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983.

c) Opacity shall not exceed 5% opacity for a period or periods aggregating more than 3 minutes during any one hour as measured by WDOE Method 9A.

d) Emissions of Non-Methane/Non-Ethane VOC (NMNEVOC) shall not exceed 0.032 lb NMNEVOC per ton of hot mixed asphaltic concrete produced as determined in accordance with Section 3.07 of PSCAA Regulation 1 using EPA reference methods 1, 3A, 4, and 25A (using either an FID with a methane “cutter”, OR using EPA Method 320 or EPA Method 18 to analyze for methane and ethane, and subtracting the methane and ethane results from the total VOC measured by the FID analyzer) from Appendix A of 40 CFR Part 60 by the average of three 60-minute test runs. NMNEVOC shall be expressed as propane. Other equivalent test methods may be used with the approval of the Agency. If other test methods are desired, the owner or operator must submit a test plan for Agency approval at least 30 days prior to the test which describes the test methods proposed for use

e) There shall be no visible emissions from the recycled asphalt pavement (RAP) feeder bin.

8. The temperature of the asphaltic concrete mix exiting the mixer shall not exceed the optimum mix temperature +25°F for each product specification as set out in the product's current WSDOT Mix Design Evaluation Report. Documentation of each product's WSDOT Mix Design Evaluation Report including optimum mix temperature shall be kept on file and incorporated into the Operations and Maintenance plan required by Agency Regulation I, Section 5.05(c).

9. The combined total recycled asphalt (RA), consisting of recycled asphalt pavement (RAP) and recycled asphalt shingles (RAS), added to the mixer shall not exceed on a 3-hour average hourly basis the greatest total RA percentage by weight used in a passing source test of Conditions 7.a, 7.b., 7.c, and 7.d until a new test is conducted.

10. Puget Paving shall not use RAS that contains asbestos, as defined in Agency Regulation III, Section 4.01(c). Puget Paving shall collect samples for every load of RAS received and have the samples analyzed using polarized light microscopy by an independent third party in accordance with 40 CFR 763, Subpart E, Appendix E, Section 1, to demonstrate that RAS is asbestos-free. The delivery log and all bulk sample analysis results shall be maintained on-site and available for inspection for a period of two years.

11. Records of every delivery of RAS shall be maintained confirming the origin, supplier, and amount (mass) of RAS.

SOURCE TESTING

12. Puget Paving shall have emissions tested for compliance with Conditions 7.a, 7.b, 7.c, and 7.d of this Order within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup of this plant. The emission tests listed in this requirement shall be repeated at an interval no less than once every five years. Puget Paving shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 21 days prior to the compliance test. The test plan shall detail the test methods used for each pollutant, the operational data that will be collected during the test, and any other relevant information about the test.

13. Puget Paving may conduct an emission test as set out in Condition 12 at any time (given notification as required in Regulation I, Section 3.07(b)) for the purposes of setting the RA limit in Condition 8. Puget

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Paving shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 21 days prior to the compliance test.

14. During the emission tests required by Conditions 12 and 13, the following operation data shall be collected during each test run and reported in the source test report:

- a) Hourly weight of RAP and RAS used, plus the hourly weight of asphalt produced;
- b) hourly and 3-hour average RA (RAP plus RAS) total percent by weight usage
- c) standard cubic feet of fuel combusted;
- d) aggregate moisture percentage (as measured by the Quality Control lab for a representative sample taken the day of the test);
- e) asphalt cement content percentage;
- f) baghouse pressure drop;
- g) baghouse fan speed (as a percentage of full speed);
- h) baghouse pulse cycle time;
- i) burner water injection nozzle pressure (psig);
- j) flue gas damper setting (as a percentage of maximum opening);
- k) maximum temperature of mix as it exits the mixer; and
- l) product specification produced during the run, a copy of the specification, and maximum temperature allowed by the specification.

PLANT MAINTENANCE

15. The baghouse shall be equipped with a gauge measuring the pressure drop across the baghouse. The pressure gauge shall be in operation whenever the baghouse is in operation. The pressure gauge shall be marked with the acceptable pressure drop range. The maximum acceptable pressure drop shall be determined from manufacturer specifications for the bags used in the baghouse. The minimum acceptable pressure drop shall be determined from manufacturer specifications for the bags used in the baghouse. The pressure drop observed during the most recent compliance source test shall fall within the defined acceptable range of pressure drop. The acceptable range and the basis for the range shall be included in the facility Operations and Maintenance plan required by Agency Regulation I, Section 5.05(c).

OPERATION AND MAINTENANCE PLAN

16. When operating, Puget Paving shall monitor and record the following information:

- a) one daily pressure drop across the baghouse;
- b) one daily inspection for visible emissions and particulate fallout for the baghouse and RAP feeder;
- c) hourly weight of RA (RAP plus RAS) used, plus the hourly weight of asphalt produced;
- d) calculated 3-hour average RA (RAP plus RAS) total percent by weight usage;
- e) annual (12 consecutive months rolling total) asphalt production;
- f) monthly fuel use;
- g) one mix temperature reading recorded for each hour in which the mixer operates;

- h) the product specification produced and the hour it was produced; and
- i) the time (in hours) the mixer operated.

ANNUAL PRODUCTION LIMITATION

- 17. Puget Paving shall record and limit the total production of asphalt to no more than 495,000 tons for any 12 consecutive months.
- 18. A notification of a violation of Condition 17 shall be sent to Puget Sound Clean Air Agency within 30 days following any month when the 12 consecutive months rolling total exceeds 495,000 tons per year of asphalt production.

EMISSION LIMITATION

- 19. Facility-wide emissions of carbon monoxide shall not exceed 99.0 tons during any 12 consecutive months after the date of this Order.
- 20. Within 30 days of the end of each month, Puget Paving shall calculate the facility-wide carbon monoxide emissions for the previous 12 months using the monthly production and the emission factor of 0.40 lbs/ton produced or the most recent carbon monoxide emission test result. If the most recent carbon monoxide test result is greater than 0.40 lbs per ton, then it must be used. If Puget Paving chooses to test CO, they shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b).
- 21. Puget Paving shall notify the Puget Sound Clean Air Agency in writing, within 30 days after the end of each 12-month period if, during that period, emissions of CO exceed 90 tons. The report shall include emissions data for the time period for which these thresholds were exceeded.

COMPLAINTS

- 22. Puget Paving shall establish a complaint response program as part of the O&M Plan. The program shall include a complaint phone line, criteria and methods for establishing whether Puget Paving may be the source of emissions related to the complaint, and a format for communicating results of investigation and advising complainants of Puget Paving corrective actions.
 - a) Puget Paving shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.
 - b) Puget Paving shall correct any problems identified by these complaint investigations within 24 hours of identification or cease operation of the equipment until the problem is resolved;
 - c) Records of all complaints received regarding air quality issues shall include information regarding date and time of complaint; name and address of complainant (if known); nature of the complaint; investigation efforts completed and basis for conclusion reached; and date, time, and nature of any corrective action taken.

RECORDS

- 22. Puget Paving shall maintain records required by this Order of Approval, as well as the records identified in the Operation and Maintenance Plan required by Regulation I, Section 5.05, for two years and make them

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available to Puget Sound Clean Air Agency personnel upon request.

23. Upon startup of the equipment reviewed under this Order of Approval, this Order supersedes and cancels Order of Approval No. 6883 dated April 30, 1997.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

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Courtney O'Gorman
Reviewing Engineer

Carole Cenci
Compliance Manager