

Lane Regional Air Pollution Authority

## MINIMAL AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

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## **PERMITTING**

### PERMITTING ACTION

1. The proposed permit is a new permit for the source.

### OTHER PERMITS

2. ODEQ issued the facility an ACDP for the portable asphalt plant on May 31, 1994 (permit #37-0022).

### ATTAINMENT STATUS

3. The portable source may be located in an attainment area for all criteria pollutants, and also may be located in a nonattainment area for PM<sub>10</sub>.

## **SOURCE DESCRIPTION**

### OVERVIEW

4. The facility's original plant was a Pioneer 302 manufactured in 1966. In 1980 the existing drum and burner were replaced with a new Pioneer drum and Genco burner. Both the original and existing plants burn reclaimed oil/diesel (backup fuel) to heat the asphalt. The existing plant has a fuel consumption rate of 600 gal/hr & 600,000 gal/yr. Fuel consumption rates for the original plant were not recorded. The plant is portable and may be operated at various sites throughout Lane County. The process includes the manufacture of 125,000 tons of hot mix asphalt annually. The plant has a design capacity of 400 tons of asphalt per hour.

### PROCESS AND CONTROL DEVICES

5. Existing air contaminant sources at the facility consist of the following:
  - 5.a. One drum-mix portable oil-fired asphaltic concrete paving plant, reconstructed in 1980 with fabric filter emission controls
  - 5.b. One 750 kW Cat 3412 generator(s) is used to supply electrical power. Annual fuel consumption is approximately 4,000 gallons of diesel per year.

### CONTINUOUS MONITORING DEVICES

6. The facility is not required to install continuous emissions monitoring devices.

**COMPLIANCE**

7. The permittee operates a baghouse for PM control. Performance testing and routine maintenance on the baghouse, housekeeping practices to minimize fugitive PM and tracking of fuel usage and asphalt production will be utilized to assure compliance with permit conditions. LRAPA personnel will inspect the facility to assess compliance at the site.

**SPECIAL CONDITIONS**

8. The facility is limited to producing a total of no more than 125,000 tons per year of asphaltic concrete.
9. The facility is required to obtain an annual burner tune-up as specified in the permit.

**EMISSIONS**

10. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Plant Site Emission Limits (PSEL)			Potential to Emit (PTE) (tons/yr)
		Previous PSEL	Proposed PSEL	PSEL Increa	
PM	0	NA	2.5	NA	20.8
PM <sub>10</sub>	0	NA	1.9	NA	16.1
SO <sub>2</sub>	0	NA	0.3	NA	2.6
NO <sub>x</sub>	0	NA	7.5	NA	62.4
CO	0	NA	8.8	NA	72.8
VOC <sup>a</sup>	0	NA	3.2	NA	26.5
Other	0	NA	NA	NA	NA

<sup>a</sup> VOC emission estimates are based on AP-42 TOC (total organic carbon) compound factors for hot, drum mix asphalt plants. The factors represent TOC as methane, and are based on EPA Method 25A test data. Since the gas stream tested may consist of organic gaseous compounds other than methane, this method underestimates the total amount of VOC's actually emitted. Since VOC emission estimates from the source are well below the SER, this estimation is acceptable.

11. The Baseline Emission Rate for this facility is zero since it was constructed after 1978.

12. The hourly PSELS are based on the maximum design rate for the portable asphalt plant. The annual PSELS are based on the proposed annual production rate as proposed by the facility. Emissions are based upon AP-42, Table 11.1-5,8 for drum mix, oil-fired, using a fabric filter.

#### SIGNIFICANT EMISSION RATE ANALYSIS

13. The proposed Plant Site Emission Limits are less than or equal to the Netting Baseline emission rates, thus no further air quality analysis is required.

### **MAJOR SOURCE APPLICABILITY**

#### CRITERIA POLLUTANTS

14. A major source is a facility that has the potential to emit more than 100 tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

#### HAZARDOUS AIR POLLUTANTS

15. A major source is a facility that has the potential to emit more than 10 tons/year of any single HAP or 25 tons/year of combined HAPs. Using VOC (3.2 tons/year), and PM emissions (2.5 tons/year) as indicators of hazardous air pollutant (HAP) emissions, the estimated HAP emissions are expected to be below 50% of the major source threshold. This facility is not a major source of hazardous air pollutants.

### **ADDITIONAL REQUIREMENTS**

#### NESHAPS/MACT APPLICABILITY

16. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

#### NSPS APPLICABILITY

17. 40 CFR Part 60, Subpart I is applicable to the source because the portable asphalt plant was reconstructed after June 11, 1973. The facility is required to not exceed 0.04 gr/dscf.

#### TACT APPLICABILITY

18. The source is subject to LRAPA's Title 33 special requirements for hot-mix asphalt plants and is therefore not required to meet TACT.

#### **SOURCE TESTING**

##### PRIOR TESTING RESULTS

19. There has been no prior testing completed by the facility.

##### PROPOSED TESTING

20. The facility is required to tune the burner of the asphalt plant annually prior to peak paving season. The facility is also required to test for PM as noted in the permit.

#### **PUBLIC NOTICE**

The draft permit was on public notice from February 21, 2001, to March 23, 2001. No written comments were received during this comment period.

MH  
4/4/01