United States Environmental Protection Agency Region 10, Air and Radiation Division 15-H13 1200 Sixth Avenue, Suite 155 Seattle, Washington 98101 Permit Number: R10NT502501 Issued: April 9, 2025 AFS Plant ID Number: 16011E0005

Non-Title V Air Quality Operating Permit

This permit is issued in accordance with the provisions of the Federal Air Rules for Reservations (FARR), 40 CFR § 49.139, and applicable rules and regulations to

Mickelsen Construction, Inc.

for operations in accordance with the conditions in this permit at the following location:

Fort Hall Reservation 1908 Tank Farm Road Pocatello, ID 83204

Local Individual Responsible for Compliance:

Delwyn Mickelsen Mickelsen Construction, Inc. 1908 Tank Farm Road Pocatello, Idaho 83204 Phone: 208-684-3803 Fax: 208-684-5058 Email: <u>dlmmcc@gmail.com</u>

A technical support document that describes the bases for conditions contained in this permit is also available.

Karl Pepple, Acting Manager Air Permits, Toxics, Transportation, and Communities Branch U.S. Environmental Protection Agency, Region 10 Date

1. General Conditions

1.1. For purposes of this permit, the permitted source consists of the following equipment and/or activities:

Emissions Unit #	Emissions Unit Description	Emissions Unit Controls
1	Aggregate Crushed Stone Processing Operations: Recycled Asphalt Pavement Impacter Crusher (Terex Pegson 4242SR Specification, 300 tons per hour rated capacity), Primary Crushing (Trio Jaw, 400 tons per hour rated capacity, and Pioneer Jaw, 600 tons per hour rated capacity), Secondary Crushing (Kodiac 300 Cone Crusher, 250 tons per hour rated capacity, Raptor 300 Cone Crusher, 250 tons per hour rated capacity, and Kodiac 400 Cone Crusher, 406 tons per hour rated capacity)	None
2	Aggregate Handling: Aggregate transfer from crusher to surge piles; Aggregate transfer from surge piles to stock piles; and Aggregate transfer from stock piles to HMA bins.	None
3	Aggregate Wind Erosion: Wind erosion of all exposed areas including piles	None
4	Aggregate Truck and Loader Traffic: Road dust caused by truck and loader traffic on paved and unpaved roads.	None
5	<u>HMA Drum Mixer</u> : Portable Alis Chalmers Model #4780146850 9 x 36 Parallel Flow Drum Mixer/Dryer, 400 ton per hour rated capacity, Recycled Asphalt Pavement (RAP) Capability, fueled with propane or natural gas fuel only, 129 MMBtu per hour burner rated capacity.	Wet Scrubber System: Barber Green Venturi Wet Wash and discharge pond*
6	Asphalt Tank Heater: Fueled with No. 2 Diesel or propane only; 1.8 MMBtu/hour burner rated capacity.	None
7	 <u>Storage Tanks</u>: (1) <u>Liquid Asphalt Cement Storage Tank</u>: 20,000 gallon capacity; heated (see tank heater) (2) <u>Liquid Asphalt Cement Storage Tank</u>: 20,000 gallon capacity; heated (see tank heater) (3) <u>Liquid Asphalt Cement Storage Tank</u>: 25,000 gallon capacity; heated (see tank heater) (4) <u>Liquid Asphalt Cement Storage Tank</u>: 30,000 gallon capacity; heated (see tank heater) 	None
8	Asphalt Aggregate Handling: via trucks, loader and conveyors; to and from piles and to drum dryer; includes RAP and concrete rubble	None
9	Asphalt Silo Filling: via conveyor from drum dryer	None
10	Asphalt Truck Loading and Fumes: HMA truck load-out from silos and fumes from loaded truck bed while in plant	None
11	Asphalt Traffic: Trucks for loading and delivery of HMA product and truck delivering liquid asphalt to the HMA plant.	None
12	Impacter Diesel Engine: Terex Pegson 4242SR Specification, 325 horsepower, 17.14 gallons of diesel combusted per hour, fueled with No. 2 diesel fuel only	None

* All emissions controls relied upon in estimating air emissions are listed.

- 1.2. Mickelsen Constuction, Inc. (permittee) shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act.
- 1.3. Compliance with the terms of this permit does not relieve or exempt the permittee from compliance with other applicable Clean Air Act requirements or other applicable federal requirements, tribal, state or local laws or regulations.
- 1.4. At such time as this source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any of Conditions 2.1 through 2.8, then the requirements of 40 CFR 52.21(j) through (s) shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- 1.5. At all times, including periods of startup, shutdown, maintenance and malfunction, the permittee shall, to the extent practicable, maintain and operate each emissions unit, including any associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions and considering the manufacturer's recommended operating procedures. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to EPA, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

2. Emissions Limits and Work Practice Requirements

- 2.1. <u>Permitted Source Carbon Monoxide (CO) Emissions Limit</u>. Source-wide CO emissions shall not exceed 80 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) calculated for the previous 11 months. Monthly CO emissions shall be determined by multiplying appropriate emissions factors (lb/unit) by the actual monthly operation/production rates (units/month) and dividing by 2000 lb/ton.
- 2.2. <u>Permitted Source Particulate Matter (PM) Emissions Limit</u>. Source-wide PM emissions shall not exceed 200 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) calculated for the previous 11 months. Monthly PM emissions shall be determined by multiplying appropriate emissions factors (lb/unit) by the actual monthly operation/production rates (units/month) and dividing by 2000 lb/ton.
- 2.3. <u>Permitted Source Particulate Matter < 10 micrometers (PM10) Emissions Limit</u>. Source-wide PM10 emissions shall not exceed 80 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) calculated for the previous 11 months. Monthly PM10 emissions shall be determined by multiplying appropriate emissions factors (lb/unit) by the actual monthly operation/production rates (units/month) and dividing by 2000 lb/ton.
- 2.4. <u>Permitted Source Particulate Matter < 2.5 micrometers (PM2.5) Emissions Limit</u>. Source-wide PM2.5 emissions shall not exceed 80 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) calculated for the previous 11 months. Monthly PM2.5 emissions shall be determined by multiplying appropriate emissions factors (lb/unit) by the actual monthly operation/production rates (units/month) and dividing by 2000 lb/ton.
- 2.5. <u>Hot Mix Asphalt Production Limitation.</u> Production of hot mix asphalt shall not exceed 300,000 tons per year as determined on a rolling 12-month basis by calculating the tons of hot mix asphalt

produced each month and adding the tons of hot mix asphalt produced for the previous 11 months.

- 2.6. <u>Raw Materials Throughput Limitation.</u> Maximum raw materials throughput shall not exceed 500,000 tons of rock, concrete rubble, or recycled asphalt pavement (or any combination of the three) per year as determined on a rolling 12-month basis by calculating the tons of raw material throughput each month and adding the tons of raw material throughput for the previous 11 months.
- 2.7. <u>Impacter Diesel Engine:</u> Operation of the Impacter Diesel Engine shall not exceed 34,280 gallons of diesel fuel combusted per year as determined on a rolling 12-month basis by calculating the gallons of diesel fuel combusted for each month and adding the gallons of diesel fuel combusted for the previous 11 months.
- 2.8. <u>Fuel Limitation.</u> The permittee shall be limited to combusting only propane or natural gas fuel in the asphalt drum dryer, only No. 2 diesel fuel Impacter diesel engine, and only No. 2 diesel and propane fuel in the asphalt tank heater.
- 2.9. <u>Good Operation</u>. All fuel burning equipment and the drum dryer wet scrubber system control device shall be maintained in good operating condition. The drum dryer exhaust shall be routed to the wet scrubber system control device at all times. The drum dryer wet scrubber system control device shall be operated at all times that the drum dryer operates.

3. Monitoring and Recordkeeping Requirements

- 3.1. <u>Visible Emissions Monitoring and Recordkeeping.</u> The permittee shall monitor and record visible emissions of particulate matter as described in Conditions 3.2 through 3.5.
- 3.2. Once each day, the permittee shall visually survey the drum dryer wet scrubber stack for the presence of visible emissions of particulate matter.
 - 3.2.1. The observer conducting the visual survey must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water on the visibility of emissions (see 40 CFR part 60, Appendix A, Test Method 22).
 - 3.2.2. For the surveys, the observer shall select a position that enables a clear view of the emissions point to be surveyed, that is at least 15 feet, but not more than 0.25 miles, from the emissions point, and where the sunlight is not shining directly in the observer's eyes.
 - 3.2.3. The observer shall observe emissions from the emissions point for at least 15 seconds.
 - 3.2.4. Any visible emissions of particulate matter other than uncombined water shall be recorded as a positive reading associated with the emissions unit.
 - 3.2.5. Surveys shall be conducted while the drum dryer is operating and during daylight hours.
- 3.3. If the survey conducted under Condition 3.2 identifies any visible emissions of particulate matter, the permittee shall:
 - 3.3.1. Immediately upon conclusion of the visual observation in Condition 3.2, investigate the source and reason for the presence of visible emissions; and

- 3.3.2. As soon as practicable, take appropriate corrective action.
- 3.4. If the corrective actions undertaken pursuant to Condition 3.3.2 do not eliminate the visible emissions, the permittee shall within 24 hours of the initial survey conduct a visible emissions observation of the emissions source in question for thirty minutes using EPA Test Method 9 (see 40 CFR part 60, Appendix A).
- 3.5. The permittee shall maintain records of the following:
 - 3.5.1. Details of each visual survey and visible emissions observation, including date, time, observer and results;
 - 3.5.2. Date, time and type of any investigation conducted pursuant to Condition 3.3.1;
 - 3.5.3. Findings of the investigation, including the reasons for the presence of visible emissions;
 - 3.5.4. Date, time and type of corrective actions taken pursuant to Condition 3.3.2;
 - 3.5.5. Complete documentation of any Method 9 visible emissions observations conducted pursuant to Condition 3.4.
- 3.6. <u>Wet Scrubber System Inspection and Recordkeeping</u>. At least once each year during which the permitted source operates, the permittee shall inspect and keep records of the physical condition of the wet scrubber system internals.
- 3.7. <u>Particulate Matter Emissions Testing</u>. Unless the permittee has performed an emissions test within 180 days before issuance of this permit that is considered acceptable by EPA, the permittee shall measure particulate matter emissions from the drum dryer wet scrubber stack while burning propane or natural gas fuel using EPA Test Method 5 (see 40 CFR part 60, Appendix A) within 60 days but not later than 180 days after issuance of this permit.
 - 3.7.1. The permittee shall provide EPA at least 30 days prior notice of any performance test, except as otherwise specified in this permit, to afford EPA the opportunity to have an observer present. If after the 30 days notice for the initially scheduled performance test, there is a delay in conducting the scheduled performance test, the permittee shall notify EPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with EPA by mutual agreement.
 - 3.7.2. The permittee shall submit to EPA a source test plan 30 days prior to any required testing that includes and addresses the following elements:
 - 3.7.2.1. Purpose and scope of testing;
 - 3.7.2.2. Source description, including a description of the operating scenarios and mode of operation during testing and including fuel sampling and analysis procedures;
 - 3.7.2.3. Schedule/dates of testing;
 - 3.7.2.4. Process data to be collected during the test and reported with the results, including source-specific data identified in the emissions unit section of this permit;
 - 3.7.2.5. Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length (e.g., one hour, 8 hours, 24 hours, etc.) and minimum sample volume;
 - 3.7.2.6. Sampling location description and compliance with the reference test methods;
 - 3.7.2.7. Analysis procedures and laboratory identification;

- 3.7.2.8. Quality assurance plan;
- 3.7.2.9. Calibration procedures and frequency;
- 3.7.2.10. Sample recovery and field documentation;
- 3.7.2.11. Chain of custody procedures;
- 3.7.2.12. Quality assurance/quality control project flow chart;
- 3.7.2.13. Data processing and reporting;
- 3.7.2.14. Description of data handling and quality control procedures; and
- 3.7.2.15. Report content and timing.
- 3.7.3. Unless EPA determines in writing that other operating conditions are representative of normal operations or unless specified in the emissions unit sections of this permit, the source shall be operated at a capacity of at least 90% but no more than 100% of maximum during all tests.
- 3.7.4. Facilities for performing and observing the emissions testing shall be provided that meet the requirements of 40 CFR 60.8(e) and EPA Test Method 1 (40 CFR Part 60, Appendix A).
- 3.7.5. During the source test, the permittee shall measure the visible emissions from the baghouse stack for the duration of each particulate matter test run using the EPA Test Method 9 (see 40 CFR part 60, Appendix A).
- 3.7.6. During the source test, the permittee shall record the operation and production parameters listed in Condition 3.8.1, 3.8.2, 3.8.6 and 3.8.7.
- 3.7.7. During or within 2 hours prior to the start of a source test, only regular operating staff may adjust the processes or emissions control devices. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid. If the emissions test method yields measured pollutant concentration values at an oxygen concentration other than specified in the emissions standard, the permittee shall correct the measured pollutant concentration to the oxygen concentration specified in the emissions standard by using the following equation:

$$PC_X = PC_m x (20.9-X) (20.9-Y)$$

Where:

 $PC_X = Pollutant concentration at X percent;$

 $PC_m = Pollutant concentration as measured;$

X = The oxygen concentration specified in the standard; and

- Y = The measured average volumetric oxygen concentration.
- 3.7.8. Each source test shall consist of at least three (3) valid test runs with results presented as the arithmetic average of all valid test runs and in the terms of any applicable emissions limit(s).
- 3.8. <u>Operation and Production Records</u>. The permittee shall track and record the source's operation and production such that source-wide emissions can be calculated on a daily, monthly and 12-month rolling basis. Records shall include, but not be limited to:
 - 3.8.1. Daily hot mix asphalt production (tons);
 - 3.8.2. Daily rock or gravel extracted on-site (tons), daily rock, concrete rubble and recycled asphalt pavement (RAP) received at this facility from off-site sources (tons), daily crushed aggregate produced on-site (tons) by type (i.e., rock, concrete rubble and RAP);

- 3.8.3. Daily amount of propane (gallons) or natural gas (cubic feet) combusted by the asphalt drum dryer;
- 3.8.4. Daily amount of No. 2 diesel fuel (gallons) combusted by the asphalt tank heater and Impacter diesel engine;
- 3.8.5. Sulfur content (%) of the No. 2 diesel fuel combusted;
- 3.8.6. Pressure drop (inches) across the wet scrubber system and total water flow (gallons per minute) to the wet scrubber system and recorded at least once per day while operating;
- 3.8.7. Documentation of any time periods when the drum dryer is producing hot mix asphalt and the wet scrubber system is not fully operational, the wet scrubber system is not in good operating condition, or the drum dryer exhaust is not being routed to the wet scrubber system; and
- 3.8.8. Daily water and dust suppressant usage for roads, aggregate crushing, and material handling including type and application technique, amount and frequency.
- 3.9. <u>Equipment Installation</u>. The permittee shall install, calibrate, maintain and operate equipment or systems for recording the operation and production records required by this permit.
- 3.10. <u>Emissions Calculations</u>. Within 20 days after each month, the permittee shall calculate and record the source-wide monthly amounts (tons/month) and the rolling 12-month total amounts (tons/year) of CO, PM, PM10 and PM2.5 emissions, hot mix asphalt produced, and raw materials (stone, concrete rubble, and recycled asphalt pavement) throughput using the calculation techniques required in Condition 2. At the same time, the permittee shall calculate and record the source-wide monthly amounts (gallons/month) and the rolling 12-month total amounts (gallons/year) of diesel fuel combusted in the Impacter Diesel Engine using the calculation technique required in Condition 2.
- 3.11. <u>Records Retention</u>. Copies of all required records of emissions calculations and parameters used to calculate emissions, monitoring records, notifications and reports required by this permit shall be kept with the asphalt plant for a period of five years and shall be made available to the EPA upon request.

4. **Reporting Requirements**

- 4.1. <u>Notification of Deviations</u>. The permittee shall notify the EPA:
 - 4.1.1. By telephone (describing the situation) within 24 hours and in writing within 10 days of determining that the drum dryer is producing hot mix asphalt and the wet scrubber system is not fully operational, the wet scrubber system is not in good operating condition, or the drum dryer exhaust is not being routed to the wet scrubber system; and
 - 4.1.2. In writing (describing the exceedance) within 10 days of determining that the rolling 12-month total emissions, calculated pursuant to Condition 3.10, exceed an emissions, production, or operational limits in Condition 2.
- 4.2. <u>Emissions Test Report</u>. The permittee shall submit to the EPA emissions testing reports within 60 days of completing any emission test required by this permit along with items required to be recorded in Condition 3.7.

- 4.3. <u>Annual and Final Emissions Report</u>. Annually, within 45 days after the end of each calendar year in which the permitted source operated, the permittee shall submit to the EPA a report that includes the monthly and rolling 12-month total emissions required by Condition 3.10 for the reporting period including all assumptions and calculations used. The final report shall only include monthly and rolling 12-month total emissions, and amounts of hot mix asphalt produced, raw material throughput, and fuel combusted in Impacter Diesel Engine including all assumptions and calculations, not previously reported in an annual report.
- 4.4. <u>Mailing Addresses and Telephone Numbers</u>. All original notifications and reports shall be submitted according to Condition 4.5 and all telephone notifications shall be made to the telephone number below. A copy of each notification required in Condition 4.1 and each emissions report required in Condition 4.3 that does not contain confidential business information shall be sent to the Tribal Environmental Contact at the address below.
- 4.5. <u>Submission of Reports</u>. The preferred method of transmission for all notifications and reports should be sent via the online Compliance and Emission Data Reporting Interface (CEDRI) located at <u>https://www.epa.gov/electronic-reporting-air-emissions/cedri</u>. If the online system is not functioning, if there are any issues with submitting the required documents, or if they contain CBI, they shall instead be sent to the address below:

Original Documents go to the EPA at:

Clean Air Act Compliance Manager U.S. EPA – Region 10, 20-C04 1200 Sixth Avenue, Suite 155 Seattle, WA 98101-3188

For telephone notifications: Call (206) 555-1331 (mention the "FARR")

Copies go to Tribal Contact at:

Air Quality Program Manager Shoshone-Bannock Tribes Fort Hall Reservation P.O. Box 306 Fort Hall, Idaho 83203